

\*\* This is a Region 5 Targeted Brownfields Assessment Funded Project \*\*

PHASE II  
SAMPLING AND ANALYSIS PLAN  
FOR THE  
SK HAND TOOLS SITE  
DEFIANCE, DEFIANCE COUNTY, OHIO

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and

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## ACRONYM LIST

ACBM	Asbestos-containing building materials
AHERA	Asbestos Hazard Emergency Response Act
AST	Aboveground storage tank
ASTM	American Society for Testing and Materials
bgs	Below ground surface
CFR	Code of Federal Regulations
CNS	Covenant Not-to-Sue
COC	Contaminant of concern
CP	Certified Professional
CRO	Cessation of Regulated Operations
DCEDO	Defiance County Economic Development Office
DO	Dissolved oxygen
DRO	Diesel range organics
Dup	Duplicate
ft	Foot or feet
gpm	Gallons per minute
GPR	Ground-penetrating radar
GPS	Global Positioning System
GRO	Gasoline range organics
HASP	Health and Safety Plan
IA	Identified area
ID	Identification
IDW	Investigation-derived waste
IPIR	Initial Pollution Incident Report
Keramida	Keramida Associates
MS/MSD	Matrix spike/matric spike duplicate
mL	Milliliter
MW	Monitoring well
NA	Not applicable
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NFA	No Further Action
OAC	Ohio Administrative Code
ODNR	Ohio Department of Natural Resources
Ohio EPA	Ohio Environmental Protection Agency
ORP	Oxidation reduction potential
OTIE	Oneida Total Integrated Enterprises
OUPS	Ohio Utilities Protection Service
PA	Property Assessment
PAH	Polynuclear aromatic hydrocarbon
PCB	Polychlorinated biphenyls
PID	Photoionization detector
POC	Point of compliance
PRP	Primary responsible party
PVC	Polyvinyl chloride

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QA/QC	Quality assurance/quality control
QAPP	Quality Assurance Project Plan
RCRA	Resource Conservation and Recovery Act
SA	Site Assessment
SAP	Sampling and Analysis Plan
SB	Soil boring
sf	Square foot or feet
SOP	Standard operating procedure
SQG	Small-quantity generator
ST	Shelby Tube
START	Superfund Technical Assessment and Response Team
SVOC	Semivolatile organic compounds
TAL	Target Analyte List
TB	Trip blank
TBA	Targeted Brownfields Assessment
TCLP	Toxicity characteristic leachate procedure
Test America	Test America, Inc.
Tetra Tech	Tetra Tech, Inc
TGM	Technical Guidance Manual
TOC	Top of casing
TPH	Total petroleum hydrocarbons
U.S. EPA	United States Environmental Protection Agency
USCS	Unified Soil Classification System
UST	Underground storage tank
VAP	Voluntary Action Program
VOC	Volatile organic compound

## 1.0 INTRODUCTION

This Sampling and Analysis Plan (SAP) identifies the Phase II Property Assessment (PA) data collection, reporting activities, and associated quality assurance/quality control (QA/QC) measures specific to the SK Hand Tools site (Property), located in Defiance, Defiance County, Ohio (**Figure 1**). The Property consists of six parcels of land totaling approximately 8.245 acres (according to the Defiance County auditor's website).

The Property is divided into eastern and western portions by Hickory Street. Five parcels, and one large building constructed in 1910 with approximately 143,491 square feet that housed the main manufacturing operations, are located east of Hickory Street. One parcel is present to the west of Hickory Street and contains a former vehicle garage and large gravel garage lot.

The Tetra Tech Inc. (Tetra Tech) Superfund Technical Assessment and Response Team (START) has prepared this SAP describing Phase II PA activities to be completed under a Targeted Brownfields Assessment (TBA) Grant. This work is being completed for the United States Environmental Protection Agency (U.S. EPA) in response to a request from the Defiance County Economic Development Office (DCEDO) to perform environmental assessment activities in order to determine the presence of contamination and prepare a Phase II PA report.

Data will be generated in accordance with the quality assurance requirements described in the *Quality Assurance Project Plan (QAPP) For Region 5 Targeted Brownfields Assessment Projects in Indiana, Illinois, Michigan, Minnesota, Ohio and Wisconsin (For Hazardous Substances and Petroleum)(TBA QAPP)*, dated June 30, 2014, revised in July 2015. This SAP will reference the *TBA QAPP* for generic tasks common to all data collection activities including routine procedures for sampling and analysis, sample documentation, equipment decontamination, sample handling, and data management, assessment and review. Additional Property-specific procedures and/or modifications to procedures described in the *TBA QAPP* are described in the Property-specific QAPP Addendum and in the following SAP elements.

The Phase II PA will be conducted in accordance with the Ohio Environmental Protection Agency (Ohio EPA) Voluntary Action Program (VAP) as codified by Ohio Administrative Code (OAC) 3745-300-07. The purpose of a Phase II PA is to conduct an investigation sufficient to determine whether all applicable standards are met or to determine that remedial activities conducted in accordance with rule 3745-300-11 of the OAC meet or will achieve applicable standards.

This SAP was prepared, reviewed, and approved in accordance with the procedures detailed in the *TBA QAPP*. Any deviations or modifications to the approved SAP will be documented using **Table 1: SAP Revision Form**.

## 2.0 PROJECT TEAM

Management of the Property will be as documented in the *TBA QAPP* and Property-specific *QAPP Addendum*. These documents present an organizational chart, communication pathways, personnel responsibilities and qualifications, and special personnel training requirements.

The following personnel will be involved in planning and/or technical activities performed for this data collection activity. Each will receive a copy of the approved SAP. (A copy of the SAP will also be retained in the Property file).

Personnel	Title	Organization	Phone Number	Email
Brad Stimple	TBA Program Manager and Project Manager	U.S. EPA	(440) 250-1717	<a href="mailto:stimple.brad@epa.gov">stimple.brad@epa.gov</a>
Jerry Hayes	Director of Economic Development	DCEDO	(419) 784-4471	<a href="mailto:jerry@defecon.com">jerry@defecon.com</a>
Kevin Scott	Program Manager	START	(312) 201- 7739	<a href="mailto:kevin.scott@tetrattech.com">kevin.scott@tetrattech.com</a>
Carol Nissen	START TBA Manager	START	(312) 201-7411	<a href="mailto:carol.nissen@tetrattech.com">carol.nissen@tetrattech.com</a>
Carl Rhodes	TBA Project Manager/ VAP Certified Professional (CP)	START	(513) 333-3660	<a href="mailto:carl.rhodes@tetrattech.com">carl.rhodes@tetrattech.com</a>
Kevin Losekamp	Project Geologist	START	(513) 333-3680	<a href="mailto:kevin.losekamp@tetrattech.com">kevin.losekamp@tetrattech.com</a>
Deborah Dunn	Laboratory Client Relations Manager	Test America	(330) 966-9292	<a href="mailto:deborah.dunn@testamericainc.com">deborah.dunn@testamericainc.com</a>

## 3.0 PROBLEM DEFINITION, SITE BACKGROUND, AND PROJECT PLANNING

### 3.1 PROBLEM DEFINITION

In 2014, Keramida Associates (Keramida) completed a Phase I PA of the Property to determine the site's eligibility for participation in the Ohio VAP and determine identified areas (IA) requiring additional investigation in a Phase II PA. The Phase I PA was completed in November 2014 and is included as **Attachment A**.

This current effort is being conducted based on the recommendations from the Phase I PA previously conducted at the Property by Keramida and historical information obtained by Tetra Tech during development of this SAP. The ultimate goal is to evaluate the IAs relative to applicable standards in pursuit of a "No Further Action" (NFA) letter from a VAP-certified professional and a "Covenant Not-to-Sue" (CNS) from the Ohio EPA for the Property. Details of Keramida's November 2014 PA are further discussed in **Section 3.2.3**.

### 3.2 SITE BACKGROUND

In October 2015, Defiance County Economic Development Office submitted a request to U.S. EPA, requesting federal TBA assistance to perform Phase II PA activities in accordance with Ohio EPA's VAP. The anticipated future use is commercial/industrial.

The Property is known as SK Hand Tools and is located in Defiance, Defiance County, Ohio. According to the Keramida Phase I PA, the Property consists of six parcels of non-contiguous land totaling approximately 8.245 acres in size. The facility was used for manufacturing for at least 65 years, prior to 2010. The most recent operating entity, SK Hand Tools, functioned as a manufacturing plant for the production of hand tools. The tools were manufactured from raw bar stock to finished goods. According to the Keramida Phase I PA, processes conducted by SK Tools included forging, die sinking, blanking, machining, broaching, polishing, heat treating, plating, and coating of steel.

According to the Keramida Phase I PA, supporting features such as underground storage tanks (USTs), aboveground storage tanks (ASTs), transformers, hydraulic lifts, and various trenches and drains also existed at the facility. The facility received an NFA dated July 13, 1991, for a 15,000 gallon kerosene UST and a 5,000 gallon diesel UST; both USTs were removed on January 1, 1992.

SK Hand Tools conducted metal plating and polishing operations at the Property until the operations ceased in July 2010. The Ohio EPA indicated that SK Hand Tools Company was served a "Cessation of Regulated Operations (CRO)" which expired on April 15, 2011. SK Hand Tools failed to comply with the CRO and several drums and various containers of waste remained at the Property.

Previous site investigations included a May 1993 Initial Pollution Incident Report (IPIR) completed by Ohio EPA, a 2011/2012 Site Assessment (SA) performed by Oneida Total Integrated Enterprises (OTIE) and a Phase I PA completed by Keramida in 2014. These investigations are described in detail below.

### **3.2.1 IPIR, May 1993**

In May of 1993, Ohio EPA submitted an IPIR for “sloppy operations” against SK Tools. According to the IPIR, metal fibers and particles released from stacks covered the land and also covered cars parked near the plant. The IPIR indicated that fibers had been “taking paint off of cars” and this had been an ongoing problem.

### **3.2.2 Site Assessment (SA) – OTIE, 2011/2012**

Due to the presence of debris, and unsecured drummed wastes at the Property, Ohio EPA requested assistance from U.S. EPA Region 5, which contracted with OTIE as the START contractor. According to the Keramida Phase I PA, OTIE performed the SA and prepared a site-specific Health and Safety Plan (HASP) and a field Sampling and Analysis Plan (SAP); collected drum and solid samples; documented on-site conditions with logbook notes and still photographs; evaluated analytical data; and prepared the SA Report.

Before sampling, OTIE performed field screening on drum contents, using cyanide monitors, to check for volatile organic compounds (VOCs). During sampling, liquid, sludge, and solid samples were collected and submitted for cyanide, toxicity characteristic leachate procedure (TCLP) metals, VOCs, and semivolatile organic compounds (SVOCs) analyses, and pH determination. At least one sampled drum contained cyanide and met the cyanide characteristics of reactivity per 40 Code of Federal Regulations (CFR) 261.23 regulations. This container was highly deteriorated. Two of the drums sampled contained highly acidic compounds that satisfied the hazardous characterization for corrosivity per 40 CFR Section 261.22. Several drums were labeled with U.S. EPA hazardous waste numbers per 40 CFR Section 261.24 and Section 261.31. The presence of these hazardous wastes may have posed a threat to nearby residents through direct exposure since the Property had evidence of vandalism.

According to the Keramida Phase I PA, U.S. EPA START completed a removal at the site in 2012. The removal included hazcatting, combining, overpacking, and disposing of significant quantities of various drummed wastes off site, including wastewater sludge from plating operations, corrosive and various other liquids, and empty containers. The final U.S. EPA START Pollution Report for the removal indicates that the removal was completed at the end of June 2012 and that no potentially responsible parties (PRPs) were found. The final report also indicates that various areas, such as the heat treat/oil room and plating room were “cleaned” and documented the following wastes (post hazcatting and combining) that were generated by START and removed from the site:

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Sodium Hydroxide	Solid	55 gal	009654980 JJK	X	
Sodium Bisulphite	liquid	55 gal	009654981 JJK	X	
Base liquids cossosive	liquid	70 gal	009654982 JJK	X	
Sulphuric Acid	liquid	165 gal	009654980 JJK	X	
Hydrochloric Acid	liquid	180 gal	009654980 JJK	X	
Neutral Liquids (D007)	liquid	2106 gal	009654979 JJK	X	
Grease	semi-solids	2 cu yds	009654981 JJK		x
Latex Paint cans, off spec	liquid	1 cu yd	009654981 JJK		x
oil base paint, off-spec	liquid	1 cu yd	009654979 JJK		x
oil-water mix	liquid	2004 gal	010011811 JJK	X	
Tolylidene diisocyanate	liquid	40 lbs	010008982 JJK	X	
RCRA empty containers ,non-haz	Solids	120 cu yd			x

Source: Keramida Phase I PA

### 3.2.3 Keramida Phase I PA, 2014

In 2014, Keramida was subsequently tasked by Defiance County with completing a Phase I PA of the site to determine the site's eligibility for participation in the Ohio VAP and determine IAs requiring additional investigation in a Phase II PA. The Phase I PA was completed in November 2014 and included as **Attachment A**.

The Phase I PA concluded the IAs listed below were associated with the Property and identified on Figure 2

<b>Identified Area</b>	<b>Location</b>	<b>Justification</b>
1	Auto Garage	Potential impact due to possible storage and use of solvents and petroleum substances.
2	Drum Storage Area	Potential release of petroleum and/or hazardous substances.
3	Plating Area	Potential impact due historic use of the area for plating operations.
4	Wastewater Trench	Potential impact due to historic use of trench transporting wastewater.
5	Wastewater Treatment Area	Potential impact due to the past wastewater treatment operations. Floor staining was observed near the treatment equipment.
6	Hydraulic Pit	Potential release of hazardous substances from hydraulic equipment.



Identified Area	Location	Justification
7	Wet Storage Area	Potential release due to the storage of unknown materials.
8	PCB-containing Transformer	Potential PCB impact from transformer.
9	Heat Treatment Area	Potential release due to historic use of the area for heat treatment operations. This area includes the former ASTs containing quench oil.
10	Former Used Oil AST Storage Area	Potential release due to the storage of hazardous materials.
11	Former Diesel Fuel AST Storage Area	Potential release due to the storage of hazardous materials.
12	Groundwater Underlying Entire Property	Potential impact from on-site activities as well as nearby facilities including a Resource Conservation and Recovery Act (RCRA)-Small Quantity Generator (SQG) facility.

### 3.2.4 Tetra Tech Asbestos Survey, 2015

At the direction of Ohio EPA, Tetra Tech performed an asbestos-containing building materials (ACBM) assessment of the building located at 135 Hickory Street, Defiance, Ohio. Tetra Tech performed a site reconnaissance and sampling effort to evaluate potential for ACBMs within the building on September 14 and 15, 2015. Site access was provided by Mr. Jerry Hayes with the City of Defiance. Since renovation/demolition activities were anticipated, the ACBM evaluation was conducted in accordance with the Asbestos Hazard Emergency Response Act (AHERA) and National Emissions Standards for Hazardous Air Pollutants (NESHAP). Tetra Tech's assessment revealed the following:

- Analytical results indicated that asbestos was present in the following areas: debris/roofing pile located in the Anneal Room, window glazing throughout the buildings, floor tile in the offices, ceiling plaster in an office, transite piping in the warehouse, and insulation in the EDM room.
- While the majority of the pipe insulation observed appeared to be newer fiberglass insulation, laboratory results indicated that some asbestos-containing insulation remained. Tetra Tech was not able to fully quantify the insulation due to in-place drop ceilings.

Intrusive sampling activities will not take place in areas of documented ACBMs to limit potential exposure to asbestos during this Phase II PA.

## 3.3 PROJECT PLANNING

Before field activities begin, Tetra Tech will prepare a HASP for the Property, which will be forwarded to U.S. EPA upon approval by Tetra Tech's Health and Safety Coordinator. Tetra Tech has collected subcontractor bids from three drilling contractors for the project and has administered the subcontract to EnviroCore, LLC. (EnviroCore) of Plain City, Ohio. The

analytical samples for this Phase II PA will be submitted to Test America, Inc., (Test America) of Canton, Ohio. Test America is an Ohio VAP-certified laboratory, No. 0024, under the Ohio EPA state term laboratory contract, and it will not be subcontracted through Tetra Tech.

Prior to performing intrusive activities on the Property, Tetra Tech will contact the Ohio Utilities Protection Service (OUPS) to mark out underground utilities. In addition, since the investigation will be completed on private property, Tetra Tech will use a private utility locating contractor (GeoSearches) to clear boring locations using various techniques including ground-penetrating radar (GPR) before drilling commences. Locations not be suitable for drilling (due to utilities or other obstructions) will be moved as close as possible to the original location and will be approved by U.S. EPA before drilling proceeds.

During the investigation efforts, Tetra Tech will conduct field screening with a MultiRAE photoionization detector (PID) to guide the sampling effort, maximizing the effectiveness of the field mobilization. This approach will allow for adjustments to field sampling activities as the project progresses.

### 3.3.1 Identified Area Designation

The Phase II PA will be conducted in accordance with the Ohio EPA VAP as codified by OAC 3745-300-07. As per OAC 3745-300-06 (E)(1), the volunteer must identify each area at the Property where a release of hazardous substances or petroleum has or may have occurred to environmental media. Based on a review of the Property history and the Phase I PA, Tetra Tech developed the following four IAs in addition to the 12 listed in the Keramida Phase I PA. Tetra Tech eliminated the Groundwater Underlying Entire Property IA from the Keramida Phase I PA based on the sampling approach to this Phase II PA. The newly developed IAs and rational for selection are listed below and are also displayed on **Figure 2**.

Location	Identified Area	Justification
12	Auto Garage Lot	Evaluate potential soil and groundwater due to onsite activities as well as nearby facilities including a RCRA-SQG facility.
13	Mill Area	Evaluate potential soil and groundwater impacts due to historic use as a milling area.
14	Snag Area	Evaluate potential soil and groundwater impacts due to historic use as a snag area.
15	Forge Area	Evaluate potential soil and groundwater impacts due to historic use as a forge.

## 4.0 PROJECT DESCRIPTION AND SCHEDULE

### 4.1 PROJECT DESCRIPTION

The purpose of the Phase II field sampling program is to identify potential contamination source areas, delineate the extent of contamination encountered at the Property, and to determine if additional source areas are contributing to contamination at the Property. The scope includes:

- Determine whether contaminants of concern (COCs) are present in soil and groundwater at the Property and, if present, determine concentrations;
- Characterize the geology and hydrogeology at the Property;
- Characterize the investigation-derived waste (IDW) generated for disposal characteristics; and
- Identify and evaluate potential COC migration and exposure pathways.

The tasks described below will be completed during the Phase II PA.

**Soil Boring Installation:** Drilling activities associated with this investigation include the installation of 31 soil borings (SB) to 10 feet (ft) below ground surface (bgs) based upon a 10-ft point of compliance (POC). The POC may be changed based on feedback from the project stakeholders and anticipated future use. Two soil borings (SB-25 and SB-32) will be installed into a glacial till unit (if present) below the shallow groundwater zone. Shelby tube samples will be collected from the glacial till unit (if present) and will be analyzed for permeability. The proposed locations are shown on **Figure 3**. The sample design plan, including sample numbers and locations, is described in **Section 6**.

Soil samples will be collected continuously from the ground surface to the termination depth; samples will be screened in the field for the potential presence of COCs using a PID. Two samples from each boring will be submitted to the laboratory for analysis; one from 0-2 ft bgs interval and the other from the interval most likely impacted based upon field observations (PID, visual, and/or olfactory), which will be from 2-10 ft bgs.

**Groundwater Monitoring Well Installation:** Nine groundwater monitoring wells (MW) will be installed by a licensed well driller 5 ft into the first encountered water-bearing unit. Groundwater may be present at the site in an upper silt zone at relatively shallow depth (15 feet bgs) that is identified on logs of monitoring wells at a gasoline station located approximately 0.25 mile east of the Property. This zone does not appear to be used for water supply in the area. This zone (if present) overlies dense glacial till (silty clay and gravel). An underlying zone of sand and gravel is reportedly present at approximately 75 feet bgs in the area and although relatively limited in yield (less than 5 gallons per minute [gpm]), was historically used for water supplies in the site vicinity. As an option for this Phase II PA, three groundwater monitoring wells (MW-10, MW-11, and MW-12) could be installed into the lower groundwater bearing zone, but only upon project stakeholder approval. The proposed locations are shown on **Figure 3**

and the sample design plan, including sample numbers and locations, is included in **Section 6**. During monitoring well installation, two soil samples from each monitoring well location (with the exception of the possible lower water bearing zone wells and wells in IA-12) will be submitted to the laboratory for analysis; one from 0-2 ft bgs and the other from the interval most likely impacted based upon field observations (PID, visual, and/or olfactory) between 2 and 10 ft bgs. Upon completion of installation, groundwater monitoring wells will be used to evaluate COCs in groundwater and to conduct hydraulic testing to comply with Ohio VAP groundwater classification and protection requirements. The sampling approach is described below:

- Develop the new monitoring wells by surging and pumping in accordance with Ohio EPA's Technical Guidance Manual (TGM) for Ground Water Investigations Chapter 8 Monitoring Well Development, Maintenance, and Redevelopment. The development process will include collection of water quality indicator parameters including pH, temperature, specific conductivity, oxidation reduction potential (ORP), dissolved oxygen (DO), and turbidity;
- Record groundwater elevations from the nine newly installed wells to determine groundwater flow direction; and
- Collect one groundwater sample from each of the newly installed monitoring wells.

**Soil sample analysis:** Soil samples will be analyzed for VOCs, SVOCs, total petroleum hydrocarbon gasoline range and diesel range organics (TPH GRO and TPH DRO), polychlorinated biphenyls (PCBs), RCRA metals, hexavalent chromium, and cyanide (**Table 2**).

**Groundwater sample analysis:** Groundwater samples will be analyzed for VOCs, SVOCs, hexavalent chromium, cyanide, and RCRA metals (**Table 2**).

**Shelby tubes:** Two Shelby tube samples will be collected from the glacial till unit (if present) from soil borings SB-25 and SB-32. The Shelby tubes will be analyzed for permeability.

**Slug tests:** Tetra Tech will conduct three slug tests on shallow groundwater monitoring wells to determine hydraulic conductivity of the groundwater zone. If the deeper optional monitoring wells are installed, slug tests will also be completed on the deep wells to determine hydraulic conductivity of the lower water bearing zone.

**Reporting:** At the conclusion of field activities, Tetra Tech will prepare an Ohio VAP-compliant TBA Phase II PA Report for submission. Tetra Tech's report will include information as outlined in OAC 3745-300-07(J). The proposed sampling approach for the field investigation is presented in **Section 6**.

## 4.2 PROJECT SCHEDULE

The primary project tasks are anticipated to be completed in accordance with the schedule summarized below.

#### **4.2.1 Planning and Mobilization**

The planning phase of the project began with the preparation of the QAPP Addendum and this Phase II SAP. Following U.S. EPA approval of the QAPP Addendum and this SAP, tasks associated with project planning and mobilization are anticipated to require up to 2 weeks. These tasks include finalization of the HASP, subcontractor procurement, utility clearances, and mobilization to the Property. Mobilization to the Property for the primary field investigation is estimated to occur within 3 weeks following SAP and QAPP Addendum approval, and approximately 5 weeks will be required to complete the field work phase.

#### **4.2.2 Soil Boring & Groundwater Sampling**

Tetra Tech estimates that the soil boring, groundwater monitoring well installation, and groundwater sampling activities at the Property can be completed in approximately 5 weeks.

#### **4.2.3 Hydraulic Testing**

Tetra Tech will conduct slug tests on three of the monitoring wells. Specific wells to be slug tested will be determined after the installation of monitoring wells is complete. It is anticipated 1 to 3 field days will be required for completion of the hydraulic testing.

#### **4.2.4 Surveying**

Following the installation of the new monitoring wells, the top of casing (TOC) elevations of the wells will be surveyed by a licensed Ohio land surveyor. The surveying is anticipated to be completed in 1 field day. In addition, Tetra Tech will use a Trimble Pro XR (or equivalent) global positioning system (GPS) to provide documentation of soil boring locations.

#### **4.2.5 Laboratory Analyses and Data Validation**

Standard laboratory analytical turnaround times (2 weeks) will be assumed throughout the project. Appropriate data validation tasks can be completed within 2 weeks of final data receipt.

#### **4.2.6 Initial Preparation and Distribution of Investigative Tables and Figures**

Data reduction, tabulation, map preparation, and interpretation tasks can be completed within 3 weeks of the completion data validation task.

#### **4.2.7 Reporting**

Tetra Tech will complete the Draft TBA Phase II PA Report approximately 4 weeks after validation of data is complete, including internal report review. Assuming a 2-week review time, preparation of the second draft will require 2 weeks, followed by another 2-week review, and 1 week for report finalization and distribution. The final TBA Phase II PA Report is therefore anticipated to be completed approximately 12 weeks after the initial preparation and distribution of the investigative tables and figures.

## **5.0 PROJECT QUALITY OBJECTIVES**

### **5.1 PROJECT OBJECTIVES**

This project is being completed to determine the presence of COCs and facilitate redevelopment of the Property.

### **5.2 MEASUREMENT AND PERFORMANCE CRITERIA**

Site-specific measurement and performance criteria described in the Site-specific *QAPP Addendum* will be used to ensure that data are sufficiently sensitive, precise, accurate, and representative to support Property decisions.

### **5.3 DATA QUALITY OBJECTIVES**

Data quality objectives address requirements that include when, where, and how to collect samples, the number of samples, and the limits on tolerable error rates. These steps should periodically be revised as new information becomes available. **Sections 5.0 and 6.0** address these objectives.

The purpose of the Phase II PA is to conduct an investigation to determine whether all applicable standards are met, and to ensure that remedial activities, conducted in accordance with rule 3745-300-11 of the OAC at the Property, meet or will achieve applicable standards.

Soil sample results will be compared to Ohio VAP generic direct-contact soil standards for the commercial/industrial and construction/excavation scenarios found in Rule 3745-300-08 of the OAC. Groundwater sample results will be compared to the generic unrestricted potable use standards within the same rule.

## 6.0 SAMPLING DESIGN

The sample design is based on Keramida's November 2014 Phase I PA report, which designated 12 IAs (as discussed in **Section 3.3.2**), Tetra Tech's addition of four IAs (as discussed in Section 3.3.1) and Tetra Tech's discussions with the U.S. EPA and other stakeholders. Tetra Tech identified 33 soil boring locations and nine groundwater monitoring well locations at the Property (**Figure 3**). Additionally, three deep groundwater monitoring wells could be installed into a lower groundwater bearing zone as an option during this Phase II PA based upon stakeholder approval. Sample locations may be moved during the investigation based on Property conditions, utility locations, and field observations. Tetra Tech will utilize Standard Operating Procedures (SOPs) to complete the field investigation which are provided in the approved Brownfields QAPP (Tetra Tech 2014).

The soil borings and groundwater monitoring well locations were chosen and will be placed within areas where evidence of past releases would most likely be found, based on Property history and operations. The placement of sample locations will allow for proper characterization of the IAs in order to satisfy requirements within OAC 3745-300-07(F)(6). **Figure 3** indicates the proposed sampling locations, and **Table 3** includes laboratory analytes, sample numbers, and QA/QC samples required. The complete sample design is discussed in **Section 4.1** and is summarized below:

- 31 soil borings will be advanced to 10 ft bgs. Two soil boring will be advanced into the clay till layer (if present) to approximately 50 ft. A Shelby tube sample will be collected from each of the deep borings and will be analyzed for permeability. Two soil samples from each soil boring will be collected and submitted for laboratory analysis of VOCs, SVOCs, TPHs (GRO and DRO), PCBs, hexavalent chromium, cyanide, and RCRA metals. One sample will be collected from the 0-2 ft bgs interval and the other from the interval most likely impacted based upon field observations (PID, visual, and/or olfactory) between 2 and 10 ft bgs;
- Groundwater monitoring wells will be installed at nine locations, MW-01 through MW-09 (potentially 12 with the three optional deep wells). During installation, two soil samples from each monitoring well location will be collected and submitted for laboratory analysis for VOCs, SVOCs, TPHs (GRO and DRO), PCBs, hexavalent chromium, cyanide, and RCRA metals with the exception of the wells in IA-12 and the optional deep monitoring wells (MW-10, MW-11, and MW-12). One sample will be collected from 0-2 ft bgs and the other from the interval most likely impacted based upon field observations (PID, visual, and/or olfactory), which would be between 2 and 10 ft bgs. Upon monitoring well completion, groundwater samples will be collected and submitted for laboratory analysis for VOCs, SVOCs, hexavalent chromium, cyanide, and RCRA metals;
- Slug testing will be completed at three of the groundwater monitoring wells to estimate hydraulic conductivity values across the Property (slug tests will be completed on the three optional deep monitoring wells if the groundwater monitoring wells are installed); and



- The newly installed monitoring wells will be surveyed to obtain TOC elevations and depth-to-water measurements will be recorded in order to determine the groundwater flow direction and other hydraulic characteristics.

## **6.1 SAMPLE COLLECTION**

### **6.1.1 Soil Sampling**

Drilling equipment will be decontaminated at a designated location on the Property before drilling operations begin, between soil borings/groundwater monitoring well locations, and at the completion of the project in accordance with Tetra Tech's SOP No. 002 on General Equipment Decontamination. Decontamination will be conducted on a temporary decontamination pad constructed at satellite locations within the Property area in support of temporary work areas. The purpose of the decontamination pad is to contain wash waters and potentially contaminated soil generated during decontamination procedures. Wash waters and contaminated soil generated during decontamination activities will be considered contaminated and thus should be collected and containerized as IDW for proper disposal.

The general procedures for soil sampling activities will follow Tetra Tech's SOP No. 005: Soil Sampling Procedures, and are summarized below:

- Prior to the start of the drilling activities, OUPS will be contacted to mark any on-site utilities. In addition, a private utility locating firm (GeoSearches) will be utilized to clear each boring on the Property;
- Prior to drilling activities, drilling equipment will be decontaminated in accordance with SOP No. 002;
- A qualified Tetra Tech geologist will describe each soil boring in accordance with American Society for Testing and Materials (ASTM) method D2488. The lithology for each boring will be classified using the Unified Soil Classification System (USCS);
- Two soil samples will be collected from cores of the 33 soil borings advanced to 10 ft bgs, and seven will be collected from monitoring wells advanced 5 ft into the first encountered water-bearing unit (anticipated total depth of the monitoring wells is approximately 15 ft to 25 ft bgs). Soil samples will not be collected from the two wells in IA-12 or the optional deep wells;
- Soil will be continuously collected using either direct-push dual-tube sampling or split-spoon technologies. The sampling liner or split spoon will be opened and a sample for VOC analysis will be collected using a Terracore sampler. The interval will also then be field screened for VOCs by placing an aliquot from every 2-foot interval into a Ziploc bag. The samples will then be screened with a PID, and soil samples will be collected for analysis of the remaining parameters;



- One Shelby tube sample will be collected from SB-25 and SB-32 from the dense glacial till underlying the shallow groundwater zone and analyzed for permeability;
- Duplicates will be collected for every 20 samples collected. A duplicate sample will be collected from the same sample interval as the original. Additional QA/QC information is provided in **Section 11**;
- Analytical parameters, sample containers, volumes, and preservatives will be as shown in **Table 3**;
- Sample containers will be placed in a cooler with ice immediately after collection. Coolers will contain enough ice to maintain sample temperature at 4 degrees Celsius. Coolers will then be sent by courier or shipped overnight to the analytical laboratory;
- Sample numbering procedures are presented in Section 6.3; and
- Soil cuttings will either be returned to the boring from which they were taken or be containerized for characterization and disposal.

### 6.1.2 Monitoring Well Installation, Development, and Sampling

Groundwater sampling activities will be conducted in accordance with Tetra Tech SOP No. 010: Groundwater Sampling. Monitoring wells will be installed at six locations as described below:

- The drilling contractor will install 2-inch diameter Schedule 40 polyvinyl chloride (PVC) casings in the wells with 10-foot long 0.010 slotted screens. Based on the details of groundwater monitoring well located at a gasoline station 0.25 mile east of the Property, the anticipated total depth of the wells installed into the shallow water bearing zone will be approximately 15 ft to 25 ft bgs. If the monitoring wells are set shallower than 13 ft bgs, 5-foot length screen sections will be used in order to provide a sufficient bentonite seal;
- An underlying zone of dense glacial till is reportedly below the shallow water bearing zone. Furthermore, sand and gravel are reportedly present at approximately 75 feet bgs in the area and although relatively limited in yield (less than 5 gpm), and was historically used for water supplies in the site vicinity. Three monitoring wells (MW-10, MW-11, and MW-12) may be installed into this zone as an option during the Phase II PA if agreed upon by project stakeholders. Also, if agreed upon, deep monitoring wells will be installed using 2-inch diameter Schedule 40 PVC casings in the wells with 10-foot long 0.010 slotted screens at depths of approximately 75 ft to 85 ft.
- A filter pack consisting of silica sand or equivalent will then be installed between the well screen and the borehole wall to approximately 2 ft above the top of the screen;

- A bentonite seal will be placed on top of the sand pack. The seal will consist of bentonite chips and will be hydrated with potable water. Additional bentonite will be placed on top of the seal to the ground surface;
- Wells will be completed with flush-mount casings. A watertight protective cover will be fitted, and the well riser will be fitted with a locking watertight cap;
- After installation, the monitoring wells will be developed using surge and purge techniques using a submersible pump. Pumping should continue until groundwater quality parameters have reached stability;
- Monitoring wells will be sampled a minimum of 24 hours after they are developed. Wells will be purged prior to sampling until field parameters stabilize. Field parameters include: pH, temperature, specific conductivity, ORP, DO, and turbidity. Criteria for stabilization are provided in the *TBA QAPP*;
- A low-flow sampling technique will be used to sample the monitoring wells. Samples will be collected in pre-preserved (as necessary) containers and placed in a cooler with ice. Samples will then be either couriered or shipped to the analytical laboratory;
- Development and purge water will be containerized in labeled IDW drums to be properly disposed of at an approved facility; and
- Analytical parameters, sample containers, volumes, and preservatives will be as shown in **Table 3**.

## 6.2 SURVEYING

Tetra Tech will contract a licensed land surveyor to survey the groundwater monitoring wells. Tetra Tech will also use a Trimble Pro XR (or equivalent) GPS to provide documentation of soil boring locations. The GPS system, capable of sub-meter accuracy, will be acceptable for northing and easting coordinate determination. In addition, sample locations may be recorded by measuring distances from permanent Property features (building corners on neighboring sites, monitoring wells, etc.).

## 6.3 SAMPLE NUMBERING SYSTEM

Samples will be identified by a unique sample identification (ID) number. The identifier will be composed of the following information:

- Matrix;
- Sample location;
- Sample depth (soil only); and
- Sample type (field, field duplicate, or QA/QC).

Matrix		Location Number	Depth (Ft)	Example Identification
Soil (Soil Boring)	Soil boring (SB)	01	08-10	SB-01-08-10
Soil (Monitoring Well)	Monitoring well (MW)	01	08-10	MW-01-08-10
Groundwater	MW	01	NA	MW-01
Permeability	Shelby Tube (ST)	01	48-50	ST-01-48-50
Duplicate	Duplicate (DUP)	01	08-10	SB-01-08-10-DUP
Trip Blank(TB)	Trip Blank	01	NA	TB-01

Sample locations will have a new sample ID, in numerical order.

#### 6.4 MANAGEMENT OF INVESTIGATION-DERIVED WASTES

Drilling will produce soil cuttings that will require containment in 55-gallon drums pending laboratory results. Tetra Tech's drilling contractor will provide drums to contain soil cuttings and purge water, and will transport the drums to an on-site location designated by U.S. EPA. The location will be accessible for future pickup by a waste disposal contractor. Following receipt of laboratory analysis, Tetra Tech will coordinate the disposal of the IDW drums.

## 7.0 SAMPLING PROCEDURES

### 7.1 STANDARD OPERATING PROCEDURES FOR SAMPLING

Sample collection will be performed in accordance with Tetra Tech's SOPs provided in Appendix D of the *TBA QAPP* and as described in **Section 6**. Sample containers will be provided by the laboratory and shall be new and pre-preserved, where necessary. Samples will be placed on ice immediately after collection and kept in a secure location. **Table 3** indicates sample containers, volumes, and preservation requirements for each analyte.

### 7.2 DECONTAMINATION PROCEDURES

Decontamination procedures are described in the *Generic QAPP* and in Tetra Tech's SOP No. 002. The following decontamination procedures shall be followed:

- All used disposable sampling supplies and disposable clothing (including gloves) will be containerized for later disposal;
- Drilling equipment will be decontaminated before drilling operations begin, between borings, and at the completion of the drilling activities with a thorough Liquinox wash and rinse or steam cleaning if necessary; and
- Sampling equipment will be decontaminated prior to sampling with a stiff, long bristle brush, using a Liquinox or Alconox solution.

## **8.0 SAMPLE HANDLING, TRACKING, AND CUSTODY PROCEDURES**

Proper sample handling and custody procedures are crucial to ensuring the quality and validity of data obtained through field and laboratory analyses. Samples will be handled, tracked, and shipped in accordance with Tetra Tech SOP No. 076-1: Sample Custody, Packaging, and Shipment.

## **9.0 FIELD ANALYTICAL METHODS AND PROCEDURES**

### **9.1 FIELD ANALYTICAL METHODS AND STANDARD OPERATING PROCEDURES**

Field methods provide rapid “real-time” results for field personnel to help guide field decision-making processes. A Multi Rae PID or similar PID will be used to perform field screening of soil samples in accordance with Tetra Tech SOP No. 005. Field screening for water samples will be conducted in accordance with Tetra Tech SOP No. 010 and will include pH, temperature, specific conductivity, ORP, turbidity, and DO. Further information is provided in the *TBA QAPP*.

### **9.2 SCREENING/CONFIRMATORY ANALYSES**

Screening and confirmatory analyses are not applicable for this scope of work.

## **10.0 FIXED LABORATORY ANALYTICAL METHODS AND PROCEDURES**

Ohio VAP requires laboratories to produce certified data to support a voluntary action. The laboratory must be certified for each analyte, parameter group, and method, as defined in paragraph (A) of Rule 3745-300-01 of the OAC. The laboratory's analyses must remain consistent with the laboratory's SOPs and quality assurance program plan, as approved by U.S. EPA. The selected laboratory, Test America, is certified under Ohio VAP, certified laboratory No. 0024.

## **11.0 QUALITY CONTROL ACTIVITIES**

### **11.1 FIELD QUALITY CONTROL**

Field duplicate samples will be collected and analyzed for this project at a frequency of one duplicate per 20 samples. Because the samples will be collected with disposable equipment, equipment blank samples will not be collected for this project.

One trip blank comprised of pre-prepared laboratory-grade water will be enclosed in each sample shipment container in which aqueous VOC samples are included. One trip blank comprised of a pre-preserved 40-milliliter (mL) glass vial and identified as a soil trip blank will be enclosed in each sample shipment container in which soil VOC samples are included.

### **11.2 ANALYTICAL QUALITY CONTROL**

An additional set of samples will be collected from the sample locations for both soil and water samples to be submitted for laboratory matrix spike/matrix spike duplicate (MS/MSD) analysis. MS/MSD samples will be collected for every 20 samples submitted for analysis.



## **12.0 DOCUMENTATION, RECORDS, AND DATA MANAGEMENT**

Reports will be prepared by the Tetra Tech project manager and submitted to the U.S. EPA TBA Coordinator during the course of the project, and as described in the *TBA QAPP*.

Documentation, records, and data management will be conducted in accordance with the *TBA QAPP*.

### 13.0 QUALITY ASSURANCE ASSESSMENT AND CORRECTIVE ACTIONS

One field audit may be completed near the beginning of the sample collection activities; however, due to the short duration of the project, one is not planned. Field audits will include the following checklist, per the *TBA QAPP*:

Item	Description of Field Audit Activities	QA Manager Initials
1.	Review of field-sampling records	
2.	Review of field-measurement procedures	
3.	Examination of the application of sample identifications following the specified protocol	
4.	Review of field instrument calibration records and procedures	
5.	Recalibration of field instruments to verify calibration to the manufacturer's specifications	
6.	Review of the sample handling and packaging procedures	
7.	Review of COC procedures	

If deficiencies are observed, they will be noted in writing, and corrective actions may need to be implemented by the Tetra Tech Project Manager.

## **14.0 REPORTS TO MANAGEMENT**

Reports will be prepared by the Tetra Tech project manager and submitted to the U.S. EPA TBA Coordinator during the course of the project, and as described in the *Generic QAPP*.

## **15.0 STEPS 1, 2 AND 3: DATA REVIEW REQUIREMENTS AND PROCEDURES**

The following steps are necessary for proper data review:

Step 1. Data verification will be performed internally by the laboratory generating the data. Data verification may result in accepted, qualified, or rejected data.

Step 2. Data validation is an analyte-specific and sample-specific process that extends the qualification of data beyond method, procedural, or contractual compliance to determine the analytical quality of specific data sets. Data will be validated based on the project-specific QAPP.

Step 3. Data usability assessment is the process of evaluating validated data to determine if the data can be used for the purpose of the project.

## 16.0 REFERENCES

- Keramida Environmental, Inc. (Keramida). May 2014. Phase I Property Assessment, Former SK Hand Tools.
- Ohio Administrative Code 3745-300-01, Definitions for the Voluntary Action Program, 2014.
- Ohio Administrative Code 3745-300-06, Phase I Property Assessments for the Voluntary Action Program, 2014.
- Ohio Administrative Code 3745-300-07, Phase II Property Assessments for the Voluntary Action Program, 2014.
- Ohio Administrative Code 3745-300-11, Remediation for the Voluntary Action Program, 2014.
- Ohio Department of Natural Resources, Water Well Log Search. Internet Address:  
<https://apps.ohiodnr.gov/water/maptechs/wellogs/app/>
- Ohio Environmental Protection Agency (Ohio EPA), 2009. Division of Drinking and Ground Water, Technical Guidance Manual for Groundwater Investigations. Chapter 8. Monitoring Well Development, Maintenance, and Redevelopment.
- Tetra Tech, Inc., 2014. Quality Assurance Project Plan (QAPP) For Region 5 Targeted Brownfields Assessment Projects in Indiana, Illinois, Michigan, Minnesota, Ohio and Wisconsin (For Hazardous Substances and Petroleum).
- Tetra Tech, Inc., December 2015. Asbestos-Containing Materials Assessment, SK Hand Tool.
- U.S. Geological Survey 7.5 Minute Topographic Quadrangle Maps: Defiance East, OH 1980 & Defiance West, OH 1972.

## TABLES

Table 1  
SAP Revision Form  
**Site:** SK Hand Tools TBA  
**EPA PM:** Brad Stimple  
TDD: 0003/S05-0003-1601-003

Date	Rev. #	Proposed Change to SAP	Reason for Change of Scope/Procedures	SAP Section Superseded	Requested By	Approved By

Table 2  
 Summary of Sampling Program  
 Environmental Samples for Laboratory Analysis  
 SK Hand Tools TBA  
 Defiance, Defiance County, Ohio

Sampling Location ID	Proposed Sampling Horizon	Purpose	Analytical Parameters						
			VOCs	SVOCs	PCBs	TPH (GRO & DRO)	Hexavalent Chromium	RCRA Metals	Cyanide
SOIL SAMPLES									
SB-01	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-01	2	2	0	2	0	0	0
SB-02	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		2	2	0	2	0	0	0
SB-03	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-02	2	2	2	2	2	2	2
SB-04	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		2	2	2	2	2	2	2
SB-05	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-03	0	2	0	0	2	2	2
SB-06	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		0	2	0	0	2	2	2
SB-07	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-04	2	2	2	0	2	2	2
SB-08	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		2	2	2	0	2	2	2
SB-09	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-05	0	2	2	0	2	2	2
SB-10	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		0	2	2	0	2	2	2
SB-11	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-06	0	2	2	0	0	0	0
SB-12	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		0	2	2	0	0	0	0
SB-13	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-07	0	2	2	0	2	2	2
SB-14	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		0	2	2	0	2	2	2
SB-15	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-08	0	0	2	0	0	0	0
SB-16	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		0	0	2	0	0	0	0
SB-17	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-09	0	2	2	0	2	2	2
SB-18	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		0	2	2	0	2	2	2
SB-19	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-10	2	2	0	2	0	0	0
SB-20	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		2	2	0	2	0	0	0
SB-21	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-11	2	2	0	2	0	0	0
SB-22	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		2	2	0	2	0	0	0
SB-23	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-12	2	2	0	2	0	2	0
SB-24	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		2	2	0	2	0	2	0
SB-25	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		2	2	0	2	0	2	0
SB-26	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		2	2	0	2	0	2	0
SB-27	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		2	2	0	2	0	2	0



Table 2  
Summary of Sampling Program  
Environmental Samples for Laboratory Analysis  
SK Hand Tools TBA  
Defiance, Defiance County, Ohio

Sampling Location ID	Proposed Sampling Horizon	Purpose	Analytical Parameters						
			VOCs	SVOCs	PCBs	TPH (GRO & DRO)	Hexavalent Chromium	RCRA Metals	Cyanide
SB-28	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-13	0	2	0	0	2	2	2
SB-29	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		0	2	0	0	2	2	2
SB-30	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-14	0	2	0	0	2	2	2
SB-31	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		0	2	0	0	2	2	2
SB-32	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-15	0	2	0	0	2	2	2
SB-33	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)		0	2	0	0	2	2	2
MW-01	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-01	2	2	0	2	0	0	0
MW-02	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-03	0	2	0	0	2	2	2
MW-03	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-04	2	2	2	0	2	2	2
MW-04	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-09	0	2	2	0	2	2	2
MW-07	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-13	0	2	0	0	2	2	2
MW-08	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-14	0	2	0	0	2	2	2
MW-09	Surface (0-2 ft bgs) & Subsurface* (2-10 ft bgs)	Further investigate soil in IA-15	0	2	0	0	2	2	2
Duplicates	NA	Quality Control	2	3	2	2	3	3	3
MS/MSD	NA	Quality Control	2	3	2	2	3	3	3
Total Number of Soil Samples Analyzed:			42	82	36	32	54	64	54

SHELBY TUBE SAMPLES			Analytical Parameters
Sampling Location ID	Proposed Sampling Horizon	Purpose	Permeability
ST-01	Shelby tube-dense glacial till unit	Investigate the permeability of the clay till on the western portion of the Property.	1
ST-02	Shelby tube-dense glacial till unit	Investigate the permeability of the clay till on the eastern portion of the Property.	1
Total Number of Shelby Tube Samples Analyzed:			2

Notes:  
ID – Identification  
ST – Shelby Tube

Table 2  
Summary of Sampling Program  
Environmental Samples for Laboratory Analysis  
SK Hand Tools TBA  
Defiance, Defiance County, Ohio

Sampling Location ID	Proposed Sampling Horizon	Purpose	Analytical Parameters				
			VOCs	SVOCs	RCRA Metals	Cyanide	Hexavalent Chromium
GROUNDWATER SAMPLES							
MW-01	Groundwater	Investigate groundwater quality at the Property	1	1	0	0	0
MW-02	Groundwater	Investigate groundwater quality at the Property	1	1	1	1	1
MW-03	Groundwater	Investigate groundwater quality at the Property	1	1	1	1	1
MW-04	Groundwater	Investigate groundwater quality at the Property	1	1	1	1	1
MW-05	Groundwater	Investigate groundwater quality at the Property	1	1	1	1	1
MW-06	Groundwater	Investigate groundwater quality at the Property	1	1	1	1	1
MW-07	Groundwater	Investigate groundwater quality at the Property	1	1	1	1	1
MW-08	Groundwater	Investigate groundwater quality at the Property	1	1	1	1	1
MW-09	Groundwater	Investigate groundwater quality at the Property	1	1	1	1	1
MW-10**	Groundwater	Investigate groundwater quality at the Property	1	1	1	1	1
MW-11**	Groundwater	Investigate groundwater quality at the Property	1	1	1	1	1
MW-12**	Groundwater	Investigate groundwater quality at the Property	1	1	1	1	1
Duplicate	Groundwater	Quality Control	1	1	1	1	1
MS/MSD	Groundwater	Quality Control	1	1	1	1	1
Total Number of Groundwater Samples Analyzed:			14	14	13	13	13

Notes:

\* Sample interval from the subsurface soil will selected based field observations (PID, visual, and/or olfactory observations)

\*\* Optional monitoring wells which will be installed in the deep water bearing zone.

bgs – Below ground surface

Ft – Foot or feet

IA – Identified area

ID – Identification

SB – Soil boring

NA – Not applicable

MS/MSD – Matrix spike/matrix spike duplicate

MW – Monitoring well

PAH – Polynuclear aromatic hydrocarbon

PCB – Polychlorinated biphenyl

TPH GRO and DRO– Total petroleum hydrocarbons, gasoline range organics and diesel range organics

RCRA – Resource Conservation and Recovery Act

SVOC – Semivolatile organic compound

VOC – Volatile organic compound

Table 3  
List of Anticipated Sample Quantities, Analytical Parameters, and  
Sample Container, Volume, and Preservation Requirements  
SK Hand Tools TBA  
Defiance, Defiance County, Ohio

Laboratory Parameters	Laboratory Method	Sample Matrix	Number of Investigative Samples	QA/QC Samples			Sample Total <sup>2</sup>	Number of Containers <sup>3</sup>	Type of Container	Preservative	Technical Holding Time <sup>4</sup>
				No. Duplicate Samples	No. MS/MSD Samples <sup>1</sup>	No. Trip Blank Samples					
RCRA metals	SW-846 Method 6010B	Soil	58	3	3	0	61	1	4-ounce wide-mouth glass jar	Cool to 4 °C	6 months
		Water	11 <sup>5</sup>	1	1	0	12	1	500-mL HDPE bottle with polyethylene-lined cap	HNO <sub>3</sub> to pH < 2 and cool to 4 °C	6 months; mercury 28 days
SVOC (including PAHs)	SW-846 Method 8270C	Soil	75	3	3	0	72	1	4-ounce wide-mouth glass jar	Cool to 4°C	14 days
		Water	12 <sup>5</sup>	1	1	0	13	2	One-liter HDPE bottles with polyethylene-lined cap	Cool to 4°C	7 days
VOC	Method 5035 (Soil Prep) SW-846 Method 8260B (Analysis)	Soil	38	2	2	1	41	1	4-ounce wide mouth glass jar with no headspace	Cool to 4°C	14 days
		Water	12 <sup>5</sup>	1	1	1	14	3	40-mL glass vials with PTFE-lined septa and open-top screw caps	Cool to 4°C adjust pH to less than 2 with HCl	7 days
Cyanide	SW-846 Method 335.4	Soil	48	3	3	0	51	1	1-4 ounce glass jar	Cool to 4° C	14 days
		Water	11 <sup>5</sup>	1	1	0	12		250 mL Plastic bottles with polyethylene-lined cap	NaOH to pH > 12 Sodium Thiosulfate if Cl present Cool to 4° C	14 days
Hexavalent Chromium	Method 3060A (Soil Prep) SW-846 Method 7196A	Soil	48	3	3	0	51	1	1-4 ounce glass jar	Cool to 4° C	30 days to digestion; 168 hours to analysis
		Water	11 <sup>5</sup>	1	1	0	12	1	250 mL Plastic bottles with polyethylene-lined cap	Cool to 4° C	24 hours
PCBs	SW-846 Method 8082	Soil	36	2	2	0	38	1	1-4-ounce glass jar	Cool to 4° C	6 months for extraction; 40 days for analysis
TPH-DRO	SW-846 Method 8015B	Soil	32	2	2	0	34	1	1-4 ounce glass jar	Cool to 4°C	14 days
TPH-GRO	SW-846 Method 8015A/OVAP	Soil	32	2	2	0	34	1	1-4-ounce wide mouth glass jar with no headspace	Cool to 4°C	14 days
Permeability	ASTM D 5084	Soil	2	0	0	0	2	1	2 ft long hollow aluminum tube	NA	NA

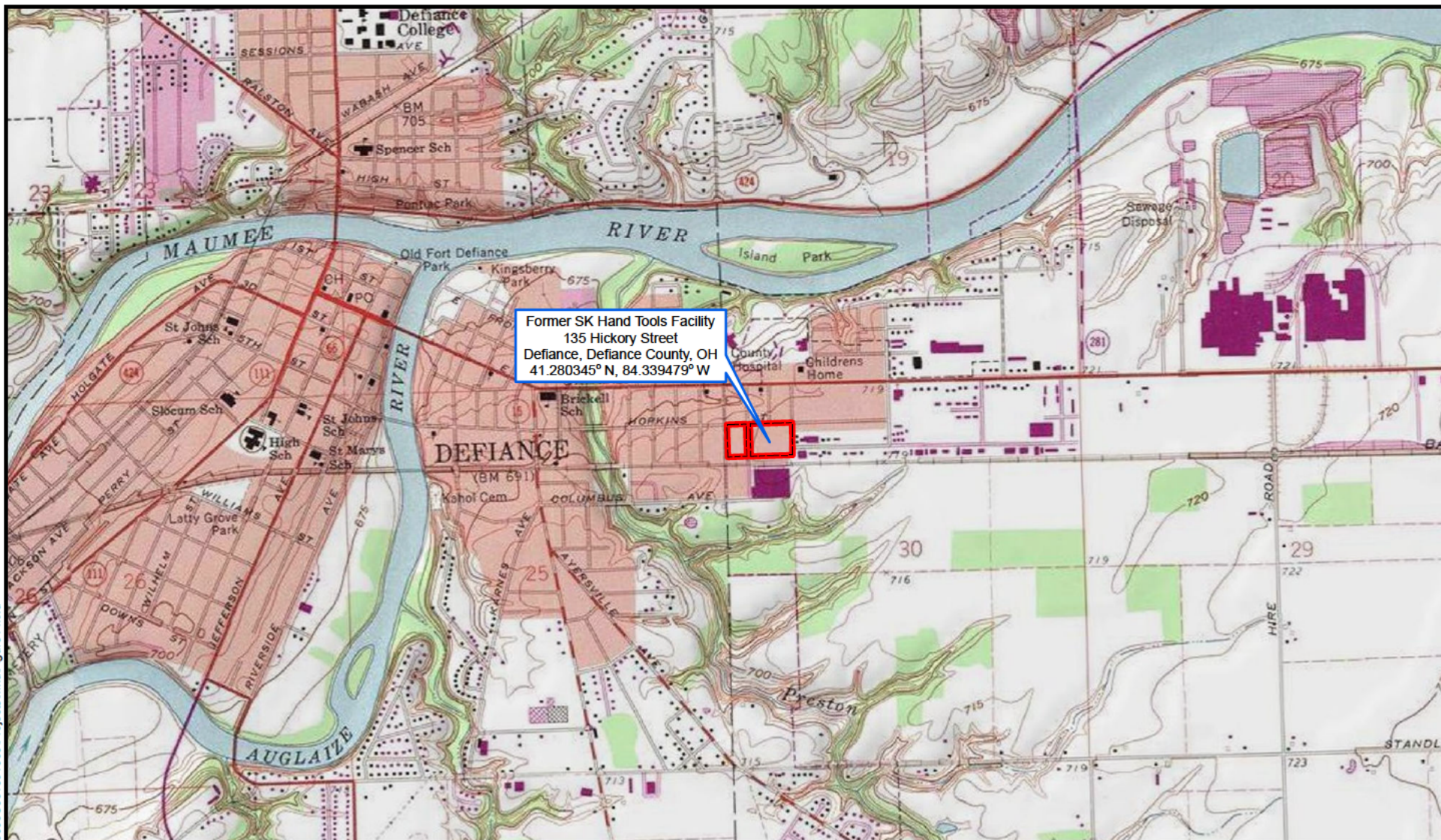
Notes:  
<sup>1</sup> MS/MSDs are not additional samples, but are instead investigative samples on which MS/MSD analyses are performed.  
<sup>2</sup> Sample total does not include MS/MSD samples.  
<sup>3</sup> The number of containers applies to each individual sample.  
<sup>4</sup> All holding times are from the date of sample collection.  
<sup>5</sup> Includes optional wells in total number of samples.

HCl – Hydrochloric acid  
HDPE – High density polyethylene  
HNO<sup>3</sup> – Nitric acid  
mL – Milliliter  
MS/MSD – Matrix spike/matrix spike duplicate  
No. – Number  
PAHs – Polynuclear aromatic hydrocarbons  
PTFE – Polytetrafluoroethylene (Teflon)

OVAP- Ohio Voluntary Action Program  
PCB – Polychlorinated biphenyl  
PTFE – Polytetrafluoroethylene (Teflon)  
RCRA – Resource Conservation and Recovery Act SW – Solid Waste  
SVOC – Semivolatile organic compound  
TPH-DRO/GRO – Total petroleum hydrocarbons – diesel range organics/gasoline range organics  
VOC – Volatile organic compound

## **FIGURES**



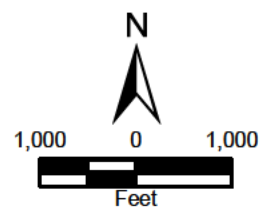


### Legend

Approximate Property Boundary

Source:  
USGS 7.5 Minute Topographic Quadrangle Maps:  
Defiance East, OH 1980; Defiance West, OH 1972

EPA Contract No.: EP-S5-13-01  
TDD No.: 0003/S05-0003-1507-200



Former SK Hand Tools  
135 Hickory Street  
Defiance, Defiance County, Ohio

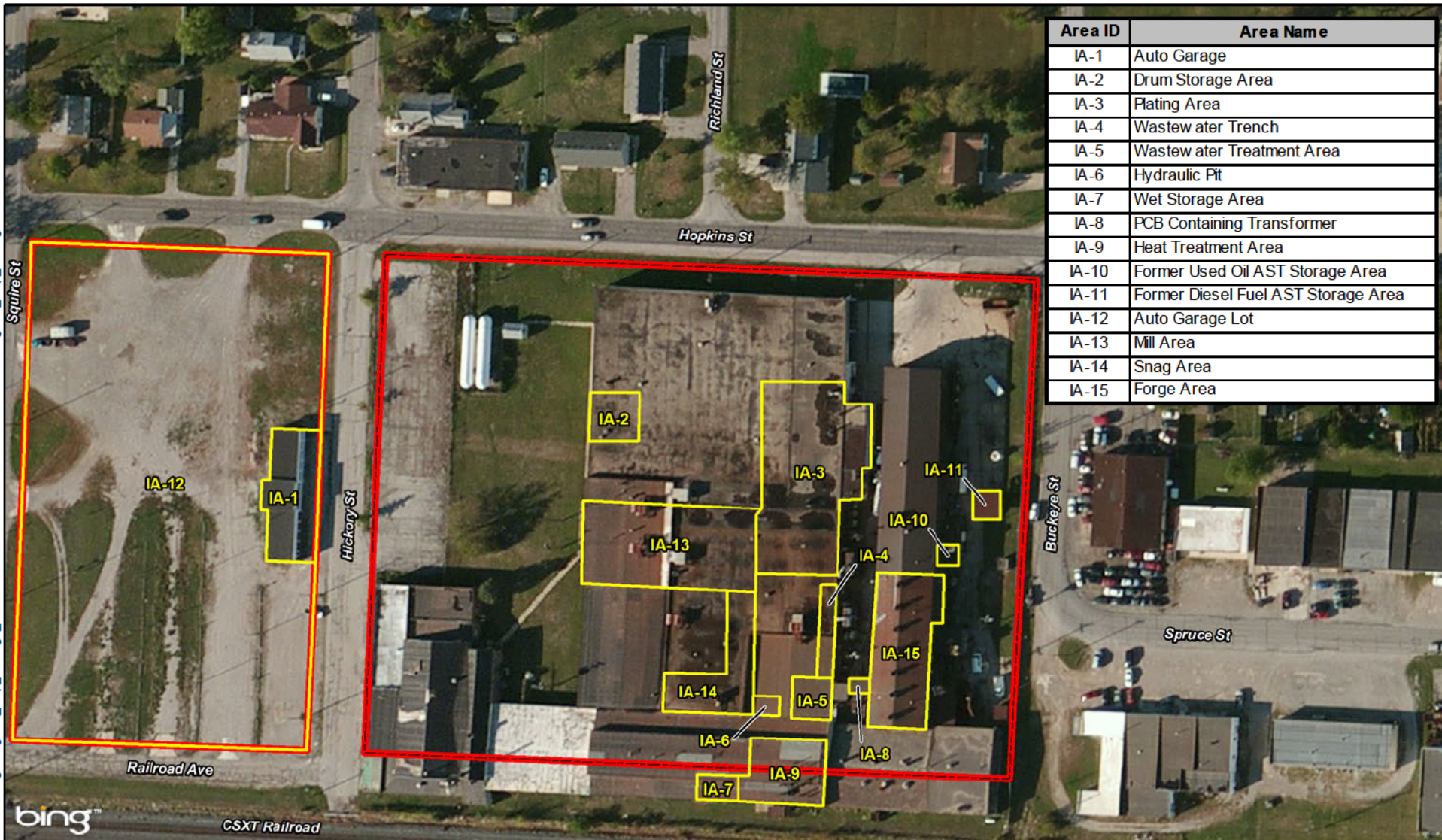
**Figure 1**  
**Site Location Map**



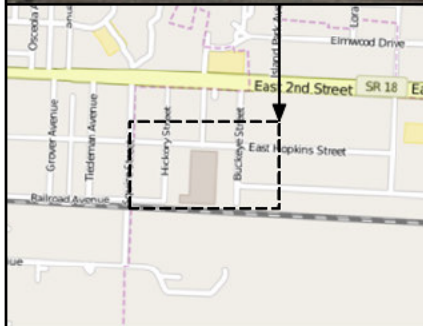
Prepared For: Kevin Losekamp

Prepared By: Nick Wiederholt





Area ID	Area Name
IA-1	Auto Garage
IA-2	Drum Storage Area
IA-3	Plating Area
IA-4	Wastewater Trench
IA-5	Wastewater Treatment Area
IA-6	Hydraulic Pit
IA-7	Wet Storage Area
IA-8	PCB Containing Transformer
IA-9	Heat Treatment Area
IA-10	Former Used Oil AST Storage Area
IA-11	Former Diesel Fuel AST Storage Area
IA-12	Auto Garage Lot
IA-13	Mill Area
IA-14	Snag Area
IA-15	Forge Area

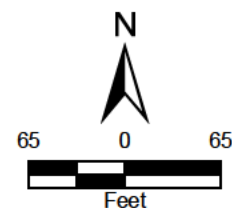


### Legend

- Approximate Property Boundary
- Identified Area (IA)
- AST Aboveground Storage Tank

Source: Bing Aerial Imagery, 2011;  
Keramida, Former SK Hand Tools, Figure 4 - Identified Areas Map

EPA Contract No.: EP-S5-13-01  
TDD No.: 0003/S05-0003-1601-003



Former SK Hand Tools  
135 Hickory Street  
Defiance, Defiance County, Ohio

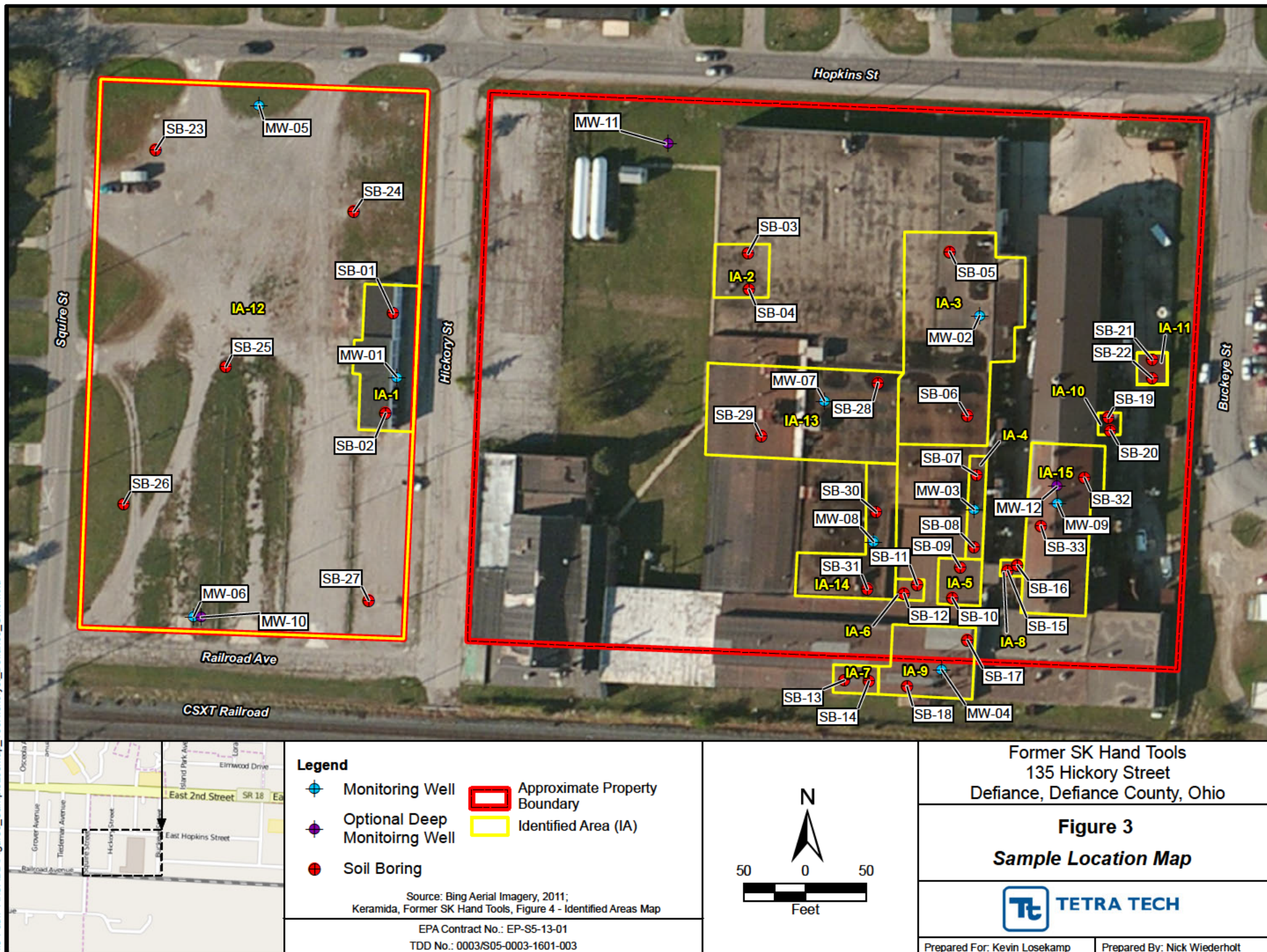
**Figure 2**  
**Identified Areas Map**



Prepared For: Kevin Losekamp

Prepared By: Nick Wiederholt





**ATTACHMENT A**  
**Keramida Phase I PA**

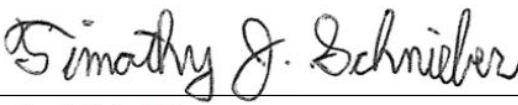


**VAP PHASE I PROPERTY ASSESSMENT  
FORMER SK HAND TOOLS  
135 HICKORY STREET  
DEFIANCE, OHIO 43512  
KERAMIDA PROJECT NO. 15831**

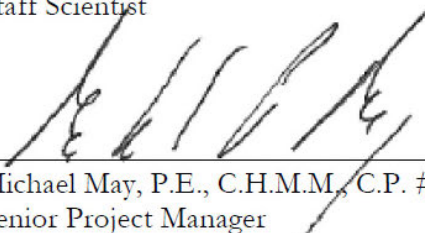
Submitted to: **MR. JERRY M. HAYES**  
Executive Director  
Defiance County Economic Development Office  
1300 East Second Street  
Defiance, Ohio 43512

Submitted by: **KERAMIDA INC.**  
4722 Madison Road  
Cincinnati, Ohio 45227  
513/769-9057

Prepared by:

  
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Timothy J. Schnieber  
Staff Scientist

Reviewed by:

  
\_\_\_\_\_  
Michael May, P.E., C.H.M.M., C.P. #350  
Senior Project Manager

May 29, 2014

We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in §312.10 of 40 CFR 312. We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312 and ASTM Standard Practice E 1527-13.



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**VAP PHASE I PROPERTY ASSESSMENT  
FORMER SK HAND TOOLS  
135 HICKORY STREET  
DEFIANCE, OHIO 43512  
KERAMIDA PROJECT NO. 15831**

Submitted to:

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Executive Director  
Defiance County Economic Development Office  
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May 29, 2014

***INCREASING OUR CLIENTS' PROFITABILITY THROUGH SMART CONSULTING™***

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## EXECUTIVE SUMMARY

KERAMIDA Inc. (KERAMIDA) performed a Voluntary Action Program (VAP) Phase I Property Assessment of the property located at 135 Hickory Street in Defiance, Defiance County, Ohio (Property) at the request of the Defiance County Economic Development Office (Client). The Phase I Property Assessment was performed in conformance with the standards of Ohio Administrative Code (OAC) §3745-300-06 “Phase I Property Assessment” for VAP and the “All Appropriate Inquiry” (AAI) as defined in CERCLA (42 U.S.C §9601 (35)(B)). Any exceptions to, or deletions from, this practice are described in the text of this report.

The purpose of the VAP Phase I Property Assessment is to determine what, if any, “Identified Areas” (IAs) exist presently on the Property. The ultimate goal of this determination is to identify actions that may be necessary to evaluate the IAs relative to applicable standards in pursuit of a “No Further Action” (NFA) letter from a VAP Certified Professional and a “Covenant Not-to-Sue” (CNS) from the Ohio EPA for the Property.

This Phase I Property Assessment revealed the following VAP Identified Areas associated with the Property:

Identified Area	Location	Justification
1	Auto Garage	Potential impacts due to possible storage and use of solvents and petroleum substances.
2	Drum Storage Area	Potential release of petroleum and/or hazardous substances.
3	Plating Area	Potential impacts due historic use of the area for plating operations.
4	Wastewater Trench	Potential impacts due to historic use of trench transporting wastewater.
5	Wastewater Treatment Area	Potential impact due to the past wastewater treatment operations. Floor staining was observed near the treatment equipment.
6	Hydraulic Pit	Potential release of hazardous substances from hydraulic equipment.
7	Wet Storage Area	Potential release due to the storage of unknown materials.
8	PCB Containing Transformer	Potential PCB impact from transformer.
9	Heat Treatment Area	Potential releases due to historic use of the area for heat treatment operations. This area includes the former presence of ASTs containing quench oil.
10	Former Used Oil AST Storage Area	Potential releases due to the storage of hazardous materials.
11	Former Diesel Fuel AST Storage Area	Potential releases due to the storage of hazardous materials.

Identified Area	Location	Justification
12	Groundwater Underlying Entire Property	Potential impacts from onsite activities as well as nearby facilities including a RCRA-SQG facility.

Based on the results of the VAP Phase I Property Assessment, it has been determined that:

- The Property is currently eligible to participate in the VAP under OAC §3745-300-02.
- A subsurface investigation is recommended to evaluate soil and groundwater conditions.
- Potential compounds of concern include but are not limited to: volatile organic compounds (VOCs), semivolatile hydrocarbons (SVOCs), Resource Conservation and Recovery Act (RCRA) metals, polychlorinated biphenyls (PCBs), and total petroleum hydrocarbons (TPHs).

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**VAP PHASE I PROPERTY ASSESSMENT  
FORMER SK HAND TOOLS  
135 HICKORY STREET  
DEFIANCE, OHIO 43512  
KERAMIDA PROJECT NO. 15831**

**1.0 INTRODUCTION**

KERAMIDA Inc. (KERAMIDA) performed a Voluntary Action Program (VAP) Phase I Property Assessment of the property located at 135 Hickory Street in Defiance, Defiance County, Ohio (Property). The Assessment was performed at the request of the Defiance County Economic Development Office (Client) and was conducted in accordance with OAC §3745-300-2, OAC §3745-300-6 and 42 U.S.C §9601 (35)(B).

**1.1 PURPOSE AND SCOPE**

The purpose of the project was to determine eligibility of the Property to participate in the VAP and identify any environmental conditions as they exist at the time of the inspection. Specifically, the VAP Phase I Property Assessment consisted of a review of records, reconnaissance of the Property and visual survey of the surrounding area, interviews with persons familiar with the Property and with local government representatives. KERAMIDA reviewed documentation made available by Environmental Data Resources, Inc. (EDR) that consisted of records from the U.S. Environmental Protection Agency (U.S. EPA), Ohio Environmental Protection Agency (OEPA), and other historical records. Additionally, historical records and information from local agencies were reviewed by KERAMIDA for indications of prior Property use and possible environmental concerns for the Property and immediately adjacent land areas.

**1.2 LIMITATIONS AND EXCEPTIONS**

This Assessment was prepared in general compliance with OAC §3745-300-6, which presents the guidelines set for a VAP Phase I Property Assessment (Phase I). KERAMIDA procedures meet the VAP and AAI requirements. KERAMIDA's professional opinions are based on reasonably obtainable, publicly available information; a Property inspection by KERAMIDA; and any information provided to KERAMIDA by the client, the owner/operator of the Property, and their representatives. No other warranty is given or implied by this report. A more extensive investigation beyond the scope of this Phase I could provide additional information concerning Property-specific conditions.



### **1.3 USER RELIANCE**

This report has been prepared for the exclusive use of the Client and persons or organizations to whom the Client wishes to make this report available. This report and the findings, conclusions and recommendations contained herein shall not, in whole or in part, be relied upon by any other party, without the prior written consent of KERAMIDA.

## **2.0 PROPERTY DESCRIPTION**

The Property consists of six (6) parcel of land totaling to approximately 8.245 acres. Two buildings are located on the Property. The first is located on the eastern portion of the Property and was built in 1910 with approximately 143,491 ft<sup>2</sup>. The second is located on the western portion of the Property and appears to be a former auto garage with a 12 car capacity. Both buildings are currently vacant.

### **2.1 LOCATION AND LEGAL INFORMATION**

The Property is located at 135 Hickory Street in Defiance, Defiance County, Ohio (Property). The Property is located in an area of mixed commercial/industrial and residential development. The Property is bounded to the south by a railroad, to the north by East Hopkins Street, to the west by Squire Street, and to the east by Buckeye Street. The Property is rectangular in shape is divided into two halves by Hickory Street which runs north and south through the middle of the Property. The Property is comprised of six (6) parcels of land totaling to approximately 8.245 acres in size with the parcel numbers J090030E00100, J090030E00200, J090030E00300, J090030E00400, J090030E00500, and J090030E00600 according to the Defiance County Auditor's page. The southern boundary of the eastern half of the Property runs through the southern portion of the Property's building.

The Property is owned by SK Hand Tool Corporation and is currently vacant. The auditor information of the Property is provided in Attachment 1. The location of the Property is shown in Figure 1 of Attachment 2. For the purpose of locating the Property, the approximate latitude/longitude coordinates are shown in Figure 5 of Attachment 2.

### **2.2 CURRENT PROPERTY USE**

The Property contains two (2) buildings which are currently vacant.

### **2.3 PROPERTY AND VICINITY GENERAL CHARACTERISTICS**

A Vicinity Map is provided as Figure 1 in Attachment 2. The Property can be located using the Defiance East, Ohio, U.S. Geological Survey 7.5-minute quadrangle map. The topography of the immediate area around the Property is relatively flat with the surrounding area having a slope to the northwest. The surface water nearest to the Property is Maumee River located approximately 1,500 feet to the north of the Property flowing generally in the easterly/northeasterly direction. The approximate elevation of the Property is 713 feet above mean sea level.

## **3.0 USER PROVIDED DOCUMENTS**

### **3.1 TITLE RECORDS**

No chain of title documentation was provided by the owner. This represents a data gap, the significance of which is discussed in Section 9.0. Prior to issuance of “No Further Action” status for the Property, a chain of title review will need to be completed.

### **3.2 SPECIALIZED KNOWLEDGE**

No previous environmental reports or other specialized knowledge were provided by the Client to KERAMIDA for this Assessment.

### **3.3 COMMONLY KNOWN INFORMATION**

KERAMIDA was not provided with any information other than that discussed elsewhere in this report.

### **3.4 OWNER, MANAGER, AND OCCUPANT INFORMATION**

Owner: SK Hand Tool Corporation  
Manager: N/A - The Property is currently vacant.  
Occupants: N/A - The Property is currently vacant.

## **4.0 RECORDS REVIEW**

An electronic records search was conducted by EDR at the request of KERAMIDA. The EDR documents submitted to KERAMIDA are included in Attachments 3 and 4.

### **4.1 PHYSICAL SETTING SOURCES**

KERAMIDA reviewed a current topographic map, a custom water well search of the Property and surrounding area, and soil survey information. The purpose of reviewing the geology and

hydrogeology of the Property was to determine if the underlying or surrounding conditions represent likely contaminant transport pathways.

#### **4.1.1 Current Topographic Map**

The purpose of reviewing the topographic setting of the Property and surrounding area was to examine the development and use of the Property and surrounding area and to identify potential routes of contaminant migration which could possibly impact the environmental condition of the Property. A Vicinity Map is provided as Figure 1 in Attachment 2. The Property can be located using the Defiance East, Ohio, U.S. Geological Survey 7.5-minute quadrangle map. The topography of the immediate area around the Property is relatively flat with the surrounding area having a slope to the northwest. The surface water nearest to the Property is Maumee River located approximately 1,500 feet to the north of the Property flowing generally in the easterly/northeasterly direction. The approximate elevation of the Property is 713 feet above mean sea level.

#### **4.1.2 Hydrogeologic Information**

The topographic map depicts the nearest surface water Maumee River located approximately 1,500 feet to the north of the Property flowing generally in the easterly/northeasterly direction. Preston Run is located approximately 2,000 feet to the west flowing generally in the northerly direction. Local patterns of groundwater flow in shallow unconsolidated deposits are typically controlled primarily by topography and proximity to local surface water features, such as lakes and creeks. Consequently, regional groundwater flow would be expected to be generally to the **northwest**.

#### **4.1.3 Water Well Search**

The purpose of identifying water well records in the vicinity of the Property was to gain information related to subsurface soil through well logs, and locate possible receptors for any known or suspected subsurface contamination. The database search report provided by EDR includes a search of federal and state water well databases. According to available water well records, as compiled by EDR, there is one (1) Federal FRDS Public Water Supply well located within a one mile radius of the Property. No Federal USGS wells or State Database wells were reported. The Federal FRDS Public Water Supply well is located ½ - 1 mile to the west/northwest of the Property.

#### **4.1.4 Soil Types**

The EDR GeoCheck® Report classifies the dominant soil composition at the Property as Fulton Loam. This classification is based on U.S. Department of Agriculture (USDA) division of Soil Conservation Service (SCS) soil maps. Fulton Loams are of the Class D hydrologic group,

characterized by very slow infiltration rates. The Fulton Loam soils are clayey, have a high water table, or are shallow to an impervious layer and are somewhat poorly drained. The corrosion potential for uncoated steel is high. Depth to the water table is greater than 53 inches below ground surface (bgs) and depth to bedrock is unknown. Fulton Loams are a partially hydric soil. The dominant rock stratigraphic unit identified beneath the Property is of the Upper Devonian series from the Paleozoic era. The GeoCheck® Report is included as Attachment 4.

## 4.2 HISTORICAL USE INFORMATION ON THE SITE AND ADJOINING PROPERTIES

The purpose of acquiring past and current ownership and historical use records was to obtain information regarding possible past uses of the Property, which, in turn, may have had an impact on the Property. Records providing such information typically include aerial photography, land title records, city directories, and Sanborn Fire Insurance Maps (Sanborns). The following segments of this section briefly describe the findings of KERAMIDA's search.

### 4.2.1 Historical Aerial Photographs

Aerial photographs are reviewed for cross-referencing purposes and inspected for possible evidence of environmental conditions, such as open dumping of solid waste. Aerial photographs were provided by EDR for the period of 1959 through 2011. Copies of the historic aerial photographs provided are presented in Attachment 3. Table 1 shows the dates of the aerial photographs reviewed and describes the observations made from this review.

**Table 1**  
**Aerial Photography Review**

Date	Property	Surrounding Properties
1959	There appears to be a large industrial structure located on the eastern portion of the Property. An additional structure appears on the western portion of the Property. The area surrounding this structure appears to be used as a parking area.	The Property is located in Defiance, Ohio and is bounded to the south by a railroad, to the north by East Hopkins Street, to the west by Squire Street, and to the east by Buckeye Street. The Property is divided into two halves by Hickory Street which runs north and south through the middle of the Property. A river appears approximately a ¼ mile north of the Property and a creek appears approximately ¼ mile west of the Property. Residential and commercial properties appear in all directions surrounding the Property.
1971	Similar to the 1959 photo above.	Additional commercial and residential development appears in all directions surrounding the Property.
1973	Similar to the 1971 photo above.	Similar to the 1971 photo above.
1988	Similar to the 1973 photo above.	Similar to the 1973 photo above.

1995	Similar to the 1988 photo above.	Similar to the 1988 photo above.
2000	Similar to the 1995 photo above.	Similar to the 1995 photo above.
2005	Similar to the 2000 photo above.	Similar to the 2000 photo above.
2006	Similar to the 2005 photo above.	Similar to the 2005 photo above.
2009	Similar to the 2006 photo above.	Similar to the 2006 photo above.
2010	Similar to the 2009 photo above.	Similar to the 2009 photo above.
2011	Similar to the 2010 photo above.	Similar to the 2010 photo above.

#### 4.2.2 Historical City Directories

Past city directories are used for cross-referencing purposes regarding ownership and tenant/lease use of the Property and surrounding area. A summary of city directories, prepared by EDR, was reviewed by KERAMIDA. The directories were researched for various years between 1962 and 2013. The listings for the Property addresses are presented in Table 2. The city directory summary is included in Attachment 3.

**Table 2**  
**City Directory Summary**

Year	Use
<b>135 Hickory Street (Property)</b>	
1962	No Record
1973	No Record
1999	SK Hand Tool Corp
2003	SK Hand Tool Corp, Philippe Rocca
2008	SK Hand Tool Corp
2013	No Record

#### 4.2.3 Historical Topographic Maps

Historical topographic maps were reviewed to depict past activities on the Property and surrounding areas. In addition to showing the shape and elevation of terrain, these maps also show residential, commercial, and industrial development. Historical topographic maps for the Property and its vicinity were provided by EDR for the period of 1909 through 1979. Copies of the historical topographic maps are provided in Attachment 3. Information obtained from the historical topographic maps is summarized in Table 3.

**Table 3**  
**Historical Topographic Map Information**

Date	Observations
<b>Target Quad: Defiance – 1:62500 Scale</b>	
1909	The Property is located in Defiance, Ohio and is bounded to the south by a railroad, to the north by East Hopkins Street, to the west by Squire Street, and to the east by Buckeye Street. No structures appear to be depicted on the Property. A large structure is depicted to the south of the Property as well as a few scattered structures to the west and north. The Maumee River is depicted to the north of the Property and Preston Run creek to the west.
<b>Target Quad: Defiance East – 1:24000 Scale</b>	
1959	The areas to the north, west, and south, as well as the Property itself, have become densely populated. Five (5) larger sized structures appear to the east of the Property.
1971	Additional structures appear to the east of the Property.
1979	Similar to the 1971 map above.

#### 4.2.4 Sanborn Fire Insurance Maps

Sanborns were reviewed to gain information on the use of the Property and its vicinity and to identify the presence of equipment and structures of possible environmental interest. Sanborns are also used for cross-referencing purposes to confirm the use of the Property and surrounding area. During this Assessment, KERAMIDA reviewed Sanborns covering the period of 1946 through 1961, provided by EDR. KERAMIDA's observations from the reviewed maps are provided in Table 4. The reviewed maps are included in Attachment 3.

**Table 4**  
**Sanborn Fire Insurance Maps**

Date	Property	Surrounding Properties
1946	One (1) large irregular shaped structure appears at the Property labeled as Ectrolite Corp. Manufacturing Tools & Metal Stampings. The northeast portion of the building is labeled warehouse. The area to the south of the warehouse is labeled factory, and to the south of the factory is a heating & forge shop. To the west of the heating & forge shop is the stamping area. To the west of the stamping area are the heater room, shipping & stock room, and the assembling area. A garage with a 12 car capacity and two (2) dwellings each with a detached auto garage are located on the western portion of the Property.	South of the Property is a railroad and west of the Property is Squire Street. The north and east of the Property are not displayed in the 1946 Sanborn Map. South of the railroad is the American Steel Package Factory.
1961	Similar to the above 1946 map.	The facility to the south of the railroad is now labeled as Johns-Manville. To the North of the Property is an auction warehouse as well

### **4.3 STANDARD ENVIRONMENTAL RECORD SOURCES**

The purpose of the regulatory file review is to obtain and review records that will aid in identifying recognized environmental conditions in connection with the Property. The records reviewed pertain not just to the Property, but also to surrounding land. This expanded review helps assess the likelihood that environmental impacts at the Property may have arisen because of migrating hazardous substances or petroleum products. The database search focused on database listings located within the ASTM Standard search distances. The results are presented in Attachment 4.

#### **4.3.1 Database Listings**

The ASTM Standard Practice E 1527 database search was performed for KERAMIDA by EDR and is included in Attachment 4. The regulatory databases searched are listed within the documentation provided by EDR. KERAMIDA performed a detailed file search of facilities identified by EDR and field reconnaissance as having the potential to adversely affect the Property. The following section includes a more detailed explanation of these facilities.

#### **4.3.2 Regulatory Findings**

There are 16 database listings located within the respective ASTM radii of the Property as identified from the regulatory file review search. Each facility was evaluated using KERAMIDA's professional judgment to determine the facility's potential impact to the Property. The factors considered in evaluating a facility's potential impact to the Property include the facility's distance from the Property; the facility's operational activities; the historical use of the facility; and the facility's location in relation to the Property, based on the presumed groundwater flow direction. For example, a facility located neither adjacent to, nor upgradient of the Property with respect to the assumed groundwater flow direction, would not be expected, in general, to impact the Property. Information obtained from the regulatory findings is summarized in Table 5. The complete results of the regulatory database search can be found in EDR's report, provided in Attachment 4.

There were 20 orphan properties identified in the database search. An orphan property is a facility that, according to EDR, does not have sufficient information to place on a map. These facilities are not likely to have an adverse effect on the Property due to their location in relation to the Property.

**Table 5**  
**Regulatory Review Summary**

As discussed in Section 4.1.2, groundwater flow direction at the Property is presumed to be to the **northwest**.

Facility Name	Facility Address	Facility Location <sup>(1)</sup>	Regulatory Information <sup>(2)</sup>	Potential Impact to Site	EDR Number <sup>(3)</sup>
SK Hand Tools Corp.	135 Hickory St.	Target Property	OH RGA LUST, RCRA-LQG, FINDS, PA MANIFEST, NY MANIFEST, OH CRO, OH LUST, OH UST, OH ARCHIVE UST, OH NPDES, CERCLIS, FTTS, HIST FTTS, ICIS	<b>Possible.</b> See Section 4.3.2.1	A1 – A10
Johns Manville International Inc.	Columbus Ave.	1/8 – 1/4 mi South	RCRA-SQG	<b>Possible.</b> Located adjacent to the Property but at a lower elevation. Groundwater flow direction at the facility is assumed to be south.	11
Defiance Hospital Inc.	1206 E 2 <sup>nd</sup> St.	1/8 – 1/4 mi NW	OH LUST, OH UST, RCRA NonGen/NLR, MLTS, FINDS, OH ARCHIVE UST	<b>None expected.</b> Assumed down-gradient at a lower elevation. Received NFA for LUST incident.	B12, B13
Former S Ohio #06534	1747 E 2 <sup>nd</sup> St.	1/4 – 1/2 mi ENE	OH LUST	<b>None expected.</b> Assumed cross-gradient. Received NFA for LUST incident.	14
Wayne Glore Trucking, Inc.	1790 Spruce St.	1/4 – 1/2 mi East	OH LUST, OH UST	<b>None expected.</b> Assumed cross-gradient. Received NFA for LUST incident.	15
Integrity Defiance Auto Body	1956 Spruce St.	1/2 - 1 mi East	CORRACTS, RCRA-SQG, FINDS	<b>None expected.</b> Assumed cross-gradient.	16

- (1) The facility location is in relation to the Property  
(2) The regulatory information is a listing of the regulatory databases in which the facility was found during EDR's regulatory file review  
(3) Number represents the facility identification number on the facility identification map (Overview Map) included in Attachment 4

CERCLIS - Comprehensive Environmental Response, Compensation, and Liability Information System  
CORRACTS – Corrective Action Report  
FINDS – Facility Index System/Facility Registry System  
FTTS – FIFRA/ TSCA Tracking System  
HIST FTTS – FIFRA/TSCA Tracking System Administrative Case Listing  
ICIS – Integrated Compliance Information System  
NY MANIFEST – Facility and Manifest Data  
OH ARCHIVE UST – OH Archived Underground Storage Tank Sites  
OH CRO – OH Cessation of Regulated Operations Facility Listing



OH LUST – Leaking Underground Storage Tank List  
OH NPDES – National Pollutant Discharge Elimination System permit  
OH RGA LUST – Recovered Government Archive Leaking Underground Storage Tank  
OH UST – OH Underground Storage Tank List  
PA MANIFEST – Manifest Information  
RCRA NonGen/NLR – RCRA-Non Generator  
RCRA-LQG – RCRA Large Quantity Generator  
RCRA-SQG – RCRA Small Quantity Generator

#### **4.3.2.1 Target Property – SK Hand Tools**

As shown in Table 5, 135 Hickory St. (Property) is listed in multiple regulatory databases including but not limited to RCRA-LQG (RCRA-Large Quantity Generator), OH LUST (Ohio Leaking Underground Storage Tank), and CERCLIS (Comprehensive Environmental Response, Compensation, and Liability Information System). The City Directories listings are presented in Table 2 and the EDR summary is included in Attachment 3. A Plant Layout Map is presented in Figure 3 of Attachment 2.

The most recent occupant, SK Hand Tools, functioned as a manufacturing plant for the production of hand tools. The tools were manufactured from raw bar stock to finished goods. At the facility, there was hot forging, blanking, machining, broaching, polishing, heat treating, and plating being performed. The facility received an NFA dated July 13, 1991 for a 15,000 gallon kerosene UST and a 5,000 gallon diesel UST. Both USTs were removed on January 1, 1992. In May of 1993, an Initial Pollution Incident Report (IPIR) was submitted to the Ohio EPA for “sloppy operations”. According to the IPIR, metal fibers and particles released from stacks covered the land and covered cars. The fibers had been taking paint off of cars and this had been an ongoing problem.

#### **4.4 VAPOR ENCROACHMENT CONDITION RISK**

Based on the information gathered in the preceding subsections of Section 4.0, vapor encroachment is not expected due to the current and historic uses of the surrounding properties. This review of vapor encroachment is not intended to replace a Tier 1 vapor encroachment screen as described in ASTM E 2600-10, but to provide a general vapor risk evaluation suitable for a Phase I ESA.

### **5.0 PROPERTY RECONNAISSANCE**

The Property inspection was performed by KERAMIDA representative Michael May, P.E., C.H.M.M., C.P., on February 20, 2014 to evaluate the Property condition and to identify potential sources of environmental concern at the Property.

The Property is located in a mixed residential and commercial/industrial use area. A list of the surrounding land uses in the vicinity of the Property at the time of the reconnaissance is provided in Table 6. A map with the surrounding land uses is provided as Figure 2 in Attachment 2.

Non-responsive

## **5.1 METHODOLOGY AND LIMITING CONDITIONS**

KERAMIDA performed the visual Property inspection by walking around the exterior and interior grounds. Selected photographs taken during the inspection are provided in Attachment 2.

## **5.2 GENERAL PROPERTY SETTING**

The Property at the time of the reconnaissance was vacant and is approximately 8.245 acres in size. The Property is located in Defiance, Ohio in an area of mixed residential and commercial/industrial development and is bounded to the south by a railroad, to the north by East Hopkins Street, to the west by Squire Street, and to the east by Buckeye Street.

## **5.3 EXTERIOR OBSERVATIONS**

Snow coverage of the ground existed across the exterior of the Property at the time of the reconnaissance. This may have an impact on our findings.

### **5.3.1 Pits, Ponds, or Lagoons**

No pits, ponds, or lagoons were observed on the Property.

### **5.3.2 Stained Soil or Pavement**

No obviously stained soil was observed during the reconnaissance.

### **5.3.3 Stressed Vegetation**

No stressed vegetation was noted during the inspection.

### **5.3.4 Solid Waste**

Solid waste or debris was not observed on the exterior of the Property but debris was observed throughout the interior of the Property. Debris included building material, wood pallets, and other general refuse.

### **5.3.5 Waste Water**

Waste water treatment equipment was observed within the southern portion of the facility just to the north of the heat treat room.

### **5.3.6 Wells**

No wells were observed at the Property. Potable water is supplied to the Property by the City of Defiance Water Division.

### **5.3.7 Septic Systems**

No clean out ports or vents of septic systems were observed.

## **5.4 INTERIOR OBSERVATIONS**

KERAMIDA was unable to gain access to the inside of the building located on the western portion of the Property. Without properly inspecting this portion of the property, the environmental condition of this area was not able to be assessed, which could impact our findings regarding the Property. This is a data gap, the significance of which is discussed in Section 9.0.

### **5.4.1 Heating/Cooling**

The Property is currently vacant. Gas powered boilers were observed in the east-central portion of the building. Electric powered heating was observed in the office area located in the southern portion of the building.

### **5.4.2 Stains or Corrosion**

General discoloration and staining of the floor slabs were observed throughout the building.

### **5.4.3 Drains and Sumps**

Floor drains and trenches were located throughout the building including but not limited to the plating and vibrating area where a trench was running north and south along the eastern wall towards the wastewater treatment equipment.

## **5.5 GENERAL PROPERTY OBSERVATIONS**

### **5.5.1 Hazardous Substances and Petroleum Products in Containers**

Hazardous substances or petroleum products were not observed on the Property.

### **5.5.2 Storage Tanks**

#### Underground Storage Tanks (USTs)

Bureau of Underground Storage Tank Regulations (BUSTR) found no records in response to KERAMIDA's request for information concerning the Property but The Property is listed as a UST site in the Regulatory Review database. The facility received an NFA dated July 13, 1991 for a 15,000 gallon kerosene UST and a 5,000 gallon diesel UST.

#### Aboveground Storage Tanks (ASTs)

Former used oil storage ASTs and diesel ASTs existed on the eastern portion of the Property. Former ASTs containing quench oil existed in the heat treat room located in the southern portion of the building. An AST was also observed in the plating area.

### **5.5.3 Odors**

No unusual odors were noted during the inspection.

### **5.5.4 Pools of Liquid**

Standing water, presumably from snow melt, was observed throughout the building. A large pool of standing water was observed cover the loading dock located in the northeastern corner of the building. Floor trenches were also observed with standing water.

### **5.5.5 Drums**

No drums were observed at the Property.

### 5.5.6 Polychlorinated Biphenyls (PCBs)

Two (2) Pole-mounted transformers were observed on the western portion of the Property. A PCB containing transformer was located on the southeast portion of the Property. No leaking or staining was observed surrounding the transformers.

## 6.0 INTERVIEWS

### 6.1 INTERVIEW WITH OWNER/OPERATOR

At the time of this Assessment, no contact information for current property owners was made available to KERAMIDA. This is a data gap, the significance of which is discussed in Section 9.0.

### 6.2 INTERVIEWS WITH LOCAL GOVERNMENT OFFICIALS

Local agencies were contacted by letter and phone to obtain information related to the Property and surrounding area. This information is gathered to assess if any incidents or physical settings occurred at these properties that would constitute a recognized environmental condition. The local agency contacts made and the various agency responses are presented in Table 7. Copies of the correspondence and files are provided in Attachment 5.

**Table 7**  
**Local Agency Information**

Agency	Contact Date	Agency Representative	Information Available
<b>135 Hickory Street (Property)</b>			
Defiance Fire Department	6/17/14	Information Officer	Contacted and awaiting a response*.
Defiance County EMA/LEPC	6/17/14	Information Officer	Records found. Selected documents summarized below.
Defiance County Health Department	6/17/14	Information Officer	Contacted and awaiting a response*.
Bureau of Underground Storage Tank Regulations	6/17/14	Nancy Caldwell	NO RECORDS FOUND
Ohio EPA Northwest District Office	6/17/14	Lynn Ackerson	Contacted and awaiting a response*.
US EPA Region 5	6/26/14	Information Officer	Records found. Selected documents summarized below.

\*If the agency provides information that could result in a change to the conclusions of this Assessment, KERAMIDA will prepare and submit an addendum to the report.

### **6.2.1 S&K Hand Tools Site Assessment Report – January 2012**

Oneida Total Integrated Enterprises (OTIE) performed a Site Assessment (SA) at the S&K Hand Tools Site (Property). OTIE, the Superfund Technical Assessment and Response Team (START) contractor, was tasked by the U.S. Environmental Protection Agency to perform this Site Assessment. OTIE prepared a site-specific Health and Safety Plan and a field Sampling and Analysis Plan; collected drum and solid samples; documented on-site conditions with logbook notes and still photographs; evaluated analytical data; and prepared a Site Assessment Report.

S&K Hand Tools conducted manufacturing operations at the Property involving metal plating and polishing until the operations at the Property shut down in July 2010. The Ohio EPA indicated that S&K Hand Tools Company was served a “Cessation of Regulated Operations (CRO)” which expired on April 15, 2011. S&K Hand Tools failed to comply with the CRO and several containers of waste remained at the Property.

Field screening with VOC and cyanide monitors was performed on drum contents prior to sampling. During sampling, liquid, sludge, and solid samples were collected and submitted for cyanide, TCLP metals, VOCs, and SVOCs analyses and pH determination. At least one sampled container at the Property contained cyanide and met the cyanide characteristics of reactivity per 40 CFR 261.23 regulations. This container was highly deteriorated. Two of the drums sampled contained highly acidic compounds that satisfy the hazardous characterization for corrosivity per 40 CFR Section 261.22. Several drums were labeled with EPA hazardous waste numbers per 40 CFR Section 261.24 and Section 261.31. The presence of these hazardous wastes may have posed a threat to nearby residents through direct exposure since the Property had evidence of vandalism.

### **6.3 INTERVIEWS WITH OTHERS**

Jerry Hayes Executive Director of the Defiance County Economic Development Office was interviewed by KERAMIDA representative Michael May, P.E., C.H.M.M., C.P. No other individuals were interviewed for this report.

### **7.0 VAP ELIGIBILITY**

The criteria for eligibility of the Property to participate in VAP is described in OAC §3745-300-02. A Property is defined as ineligible if any of the following are true:

- The Property is listed on the “National Priorities List”.
- The Property is subject to the underground injection program and is subject to an order or permit requiring site assessment, removal, or remediation of hazardous substances or petroleum under the Safe Drinking Water Act.
- The Property is subject to federal or state corrective action permit obligations under RCRA.
- The Property is under a federal enforcement action requiring assessment, removal, or remedial activities.
- The Property is subject to closure requirements under Chapter 3734 of the Ohio Revised Code (hazardous and solid waste facilities).
- The Property is subject to site assessment, removal, or remediation regarding underground storage tank systems.
- The Property is subject to site assessment, removal, or remediation pursuant to Chapter 1509 of the Ohio Revised Code (oil & gas).
- The Property is subject to a state enforcement letter relating to a release or threatened release of hazardous substances or petroleum.

KERAMIDA’s review of regulatory information has not revealed any of the above conditions. Thus, the Property is currently eligible to participate in VAP.

## 8.0 FINDINGS & CONCLUSIONS

Based on the reviewed records and the inspection, KERAMIDA finds twelve (12) VAP Identified Areas (IA), depicted on Figure 4 in Attachment 2. A summary of each IA is provided below.

This Phase I revealed the following VAP Identified Areas associated with the Property:

Identified Area	Location	Justification
1	Auto Garage	Potential impacts due to possible storage and use of solvents and petroleum substances.
2	Drum Storage Area	Potential release of petroleum and/or hazardous substances.
3	Plating Area	Potential impacts due historic use of the area for plating operations.
4	Wastewater Trench	Potential impacts due to historic use of trench transporting wastewater.
5	Wastewater Treatment Area	Potential impact due to the past wastewater treatment operations. Floor staining was observed near the treatment equipment.



Identified Area	Location	Justification
6	Hydraulic Pit	Potential release of hazardous substances from hydraulic equipment.
7	Wet Storage Area	Potential release due to the storage of unknown materials.
8	PCB Containing Transformer	Potential PCB impact from transformer.
9	Heat Treatment Area	Potential releases due to historic use of the area for heat treatment operations. This area includes the former presence of ASTs containing quench oil.
10	Former Used Oil AST Storage Area	Potential releases due to the storage of hazardous materials.
11	Former Diesel Fuel AST Storage Area	Potential releases due to the storage of hazardous materials.
12	Groundwater Underlying Entire Property	Potential impacts from onsite activities as well as nearby facilities including a RCRA-SQG facility.

Based on the results of the Phase I, it has been determined that:

- The Property is currently eligible to participate in the VAP under OAC §3745-300-02.
- A subsurface investigation is recommended to evaluate soil and groundwater conditions.
- Potential compounds of concern include but are not limited to: volatile organic compounds (VOCs), semivolatile hydrocarbons (SVOCs), Resource Conservation and Recovery Act (RCRA) metals, polychlorinated biphenyls (PCBs), and total petroleum hydrocarbons (TPHs).

## 9.0 DEVIATIONS

Any deviations or data gaps that were encountered during the preparation of this report are discussed elsewhere in this report in the section where the data gap or deviation was found. The data gaps consist of the following:

- Historic Chain of Title information was not provided to KERAMIDA for review. It is not expected that the Chain of Title information would provide any information that would materially alter the findings of this Phase I. Prior to issuance of “No Further Action” status for the Property, a Chain of Title review will need to be completed.
- No Property owner was available for interview. This could have an impact on our findings.

- Records have not yet been received from all agencies in response to information requests submitted to local, state, and federal agencies as of the date of this report. This could have an impact on our findings.
- KERAMIDA was not able to interview persons with extensive knowledge of the past operation at the Property.
- Snow coverage of the ground existed across the Site at the time of the Site walk assessment. This may have an impact on our findings.
- KERAMIDA was unable to gain access to the inside of the building located on the western portion of the Property. Without properly inspecting this portion of the property, the environmental condition of this area was not able to be assessed. This could have an impact on our findings.

## 10.0 ADDITIONAL SERVICES

No additional services were provided beyond the scope of an Ohio VAP-compliant Phase I.

## 11.0 REFERENCES

Defiance County Auditor. Property Information. Internet Address:

<http://defiance.ddti.net/Search.aspx>

EDR. Aerial Photographs, Years: 1959, 1971, 1973, 1988, 1995, 2000, 2005, 2006, 2009, 2010, 2011.

EDR. City Directories, Years: 1962, 1973, 1999, 2003, 2008, 2013.

EDR. Regulatory Database Search: Inquiry Number 3974220.2s June 17, 2014

EDR. Topographic Maps, Years: 1909, 1959, 1971, 1979

EDR. Sanborn Fire Insurance Maps, Years: 1946, 1961

USGS. 1979. Topographic Map, Defiance East, OH Quadrangle.

**VAP PHASE I PROPERTY ASSESSMENT  
FORMER SK HAND TOOLS  
135 HICKORY STREET  
DEFIANCE, OHIO 43512  
KERAMIDA PROJECT NO. 15831**

**ATTACHMENT 1**  
Property Information  
Defiance County Assessor Property Information

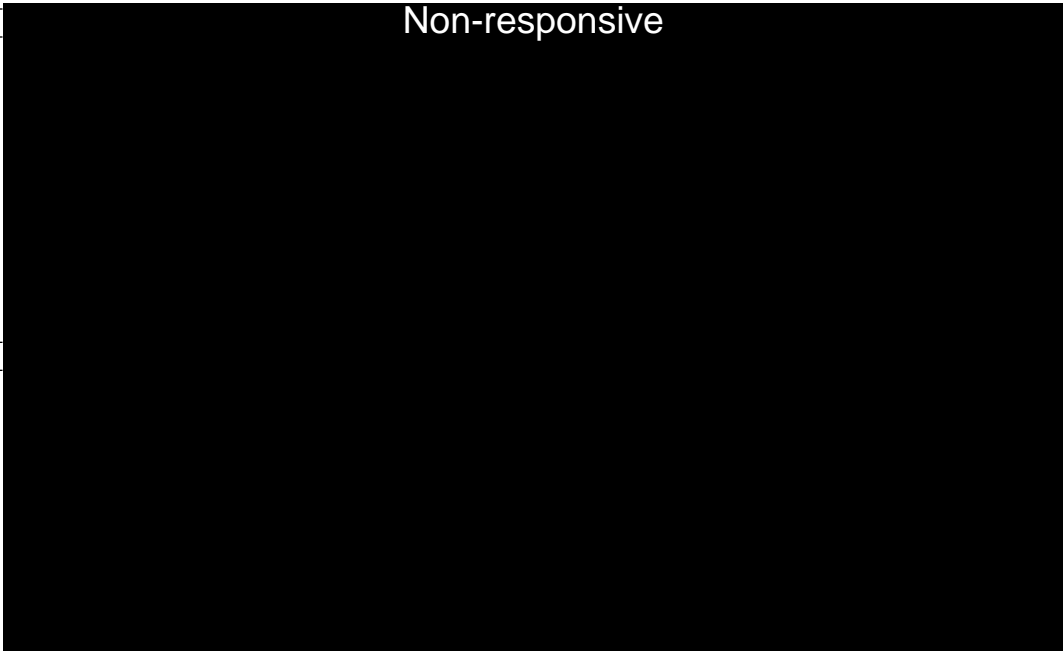
Defiance County, Ohio - Property Record Card, Page 1  
Parcel: J090030E00100

GENERAL PARCEL INFORMATION

Owner	SK HAND TOOL CORPORATION
Property Address	HICKORY
Mailing Address	SK HAND TOOL CORPORATION
	4001 N RAVENSWOOD AVE SUITE 505
	CHICAGO IL 60613
Owner Address	300 INDUSTRIAL VACANT PLATTED LAND
	ENTERPRISE ADD BLK2 RICHL
Land Use	LOT 27,29,31,33,35
Legal Description	

VALUATION

	Appraised	Assessed
Land Value	\$9,700.00	\$3,400.00
Improvements Value	\$0.00	\$0.00
Total Value	\$9,700.00	\$3,400.00
Taxable Value	\$3,400.00	



SALES

Sale Date	Sale Amount	Buyer	Conveyance	Notes
1/1/1992	\$0.00	SK HAND TOOL	0	

AGRICULTURAL

Code	Soil	Acres	Rate	Appraised	Assessed	CAUV	CAUV	Taxable
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LAND

Code	Frontage	Depth	Street Price	Depth Percent	Rate	Total	Value	Acres
A1 - PRIMARY	0	0/0	0	11300%	30000	\$22,050.00	\$9,700.00	0.735

Defiance County, Ohio - Property Record Card, Page 1  
Parcel: J090030E00200

GENERAL PARCEL INFORMATION		
Owner	SK HAND TOOL CORPORATION	
Property Address	129 SQUIRES	
Mailing Address	SK HAND TOOL CORPORATION 4001 N RAVENSWOOD AVE SUITE 505 CHICAGO IL 60613	
Owner Address	300 INDUSTRIAL VACANT PLATTED LAND ENTERPRISE ADD BLK2 RICHL	
Land Use	LOT 37,39,41	
Legal Description		
VALUATION		
	Appraised	Assessed
Land Value	\$5,820.00	\$2,040.00
Improvements Value	\$0.00	\$0.00
Total Value	\$5,820.00	\$2,040.00
Taxable Value	\$2,040.00	

SALES					AGRICULTURAL								
Sale Date	Sale Amount	Buyer	Conveyance	Notes	Code	Soil	Acres	Rate	Appraised	Assessed	CAUV	CAUV	Taxable
1/1/1992	\$0.00	SK HAND TOOL	0										

LAND								
Code	Frontage	Depth	Street Price	Depth Percent	Rate	Total	Value	Acres
A1 - PRIMARY	0	0/0	0	9600%	30000	\$13,230.00	\$5,820.00	0.441

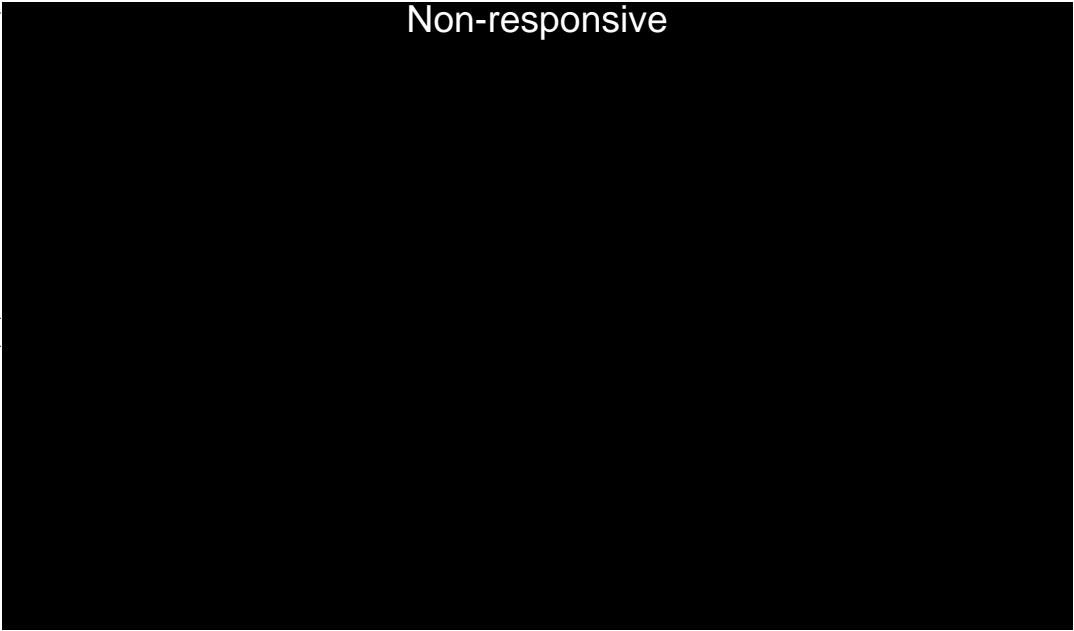
Defiance County, Ohio - Property Record Card, Page 1  
Parcel: J090030E00300

GENERAL PARCEL INFORMATION

Owner	SK HAND TOOL CORPORATION
Property Address	HICKORY
Mailing Address	SK HAND TOOL CORPORATION
	4001 N RAVENSWOOD AVE SUITE 505
	CHICAGO IL 60613
Owner Address	300 INDUSTRIAL VACANT PLATTED LAND
	ENTERPRISE ADD BLK2 RICHL
Land Use	LOT 28,30,32,34,36
Legal Description	

VALUATION

	Appraised	Assessed
Land Value	\$9,700.00	\$3,400.00
Improvements Value	\$0.00	\$0.00
Total Value	\$9,700.00	\$3,400.00
Taxable Value	\$3,400.00	



SALES

Sale Date	Sale Amount	Buyer	Conveyance	Notes
1/1/1992	\$0.00	SK HAND TOOL	0	

AGRICULTURAL

Code	Soil	Acres	Rate	Appraised	Assessed	CAUV	CAUV	Taxable
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LAND

Code	Frontage	Depth	Street Price	Depth Percent	Rate	Total	Value	Acres
A1 - PRIMARY	0	0/0	0	10000%	30000	\$22,050.00	\$9,700.00	0.735

Defiance County, Ohio - Property Record Card, Page 1  
Parcel: J090030E00400

GENERAL PARCEL INFORMATION

Owner	SK HAND TOOL CORPORATION
Property Address	HICKORY
Mailing Address	SK HAND TOOL CORPORATION
	4001 N RAVENSWOOD AVE SUITE 505
	CHICAGO IL 60613
Owner Address	300 INDUSTRIAL VACANT PLATTED LAND
	ENTERPRISE ADD BLK2 RICHL
Land Use	LOT 38,40,42,44
Legal Description	

VALUATION

	Appraised	Assessed
Land Value	\$7,760.00	\$2,720.00
Improvements Value	\$0.00	\$0.00
Total Value	\$7,760.00	\$2,720.00
Taxable Value	\$2,720.00	

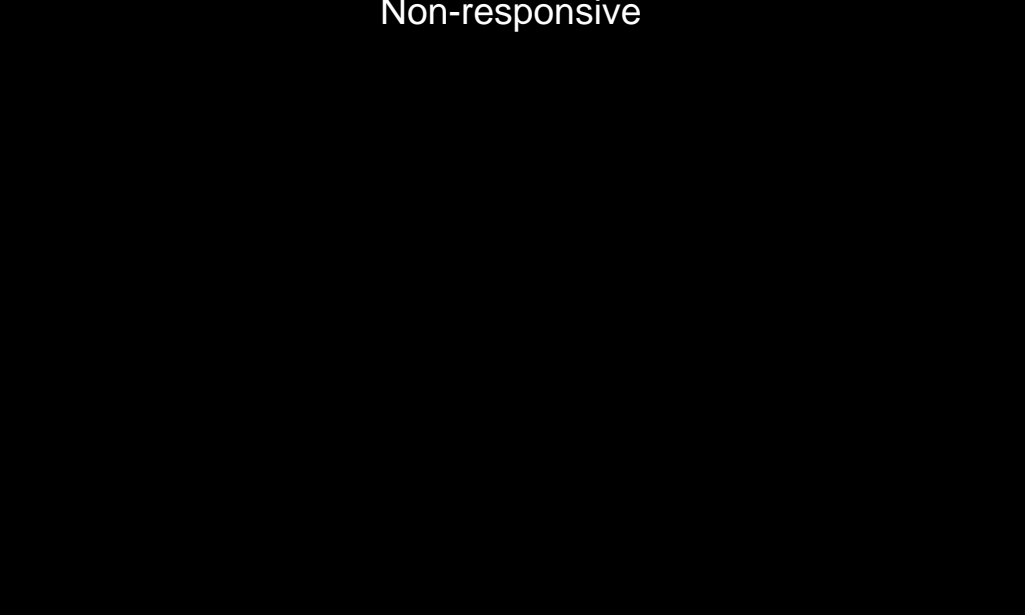
SALES

Sale Date	Sale Amount	Buyer	Conveyance	Notes
1/1/1992	\$0.00	SK HAND TOOL	0	

LAND

Code	Frontage	Depth	Street Price	Depth Percent	Rate	Total	Value	Acres
A1 - PRIMARY	0	0/0	0	11900%	30000	\$17,640.00	\$7,760.00	0.588

MAP



AGRICULTURAL

Code	Soil	Acres	Rate	Appraised	Assessed	CAUV	CAUV	Taxable
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Defiance County, Ohio - Property Record Card, Page 1  
Parcel: J090030E00500

GENERAL PARCEL INFORMATION

Owner	SK HAND TOOL CORPORATION
Property Address	SQUIRES
Mailing Address	SK HAND TOOL CORPORATION
	4001 N RAVENSWOOD AVE SUITE 505
	CHICAGO IL 60613
Owner Address	300 INDUSTRIAL VACANT PLATTED LAND
	ENTERPRISE ADD BLK2 RICHL
Land Use	LOT 43
Legal Description	

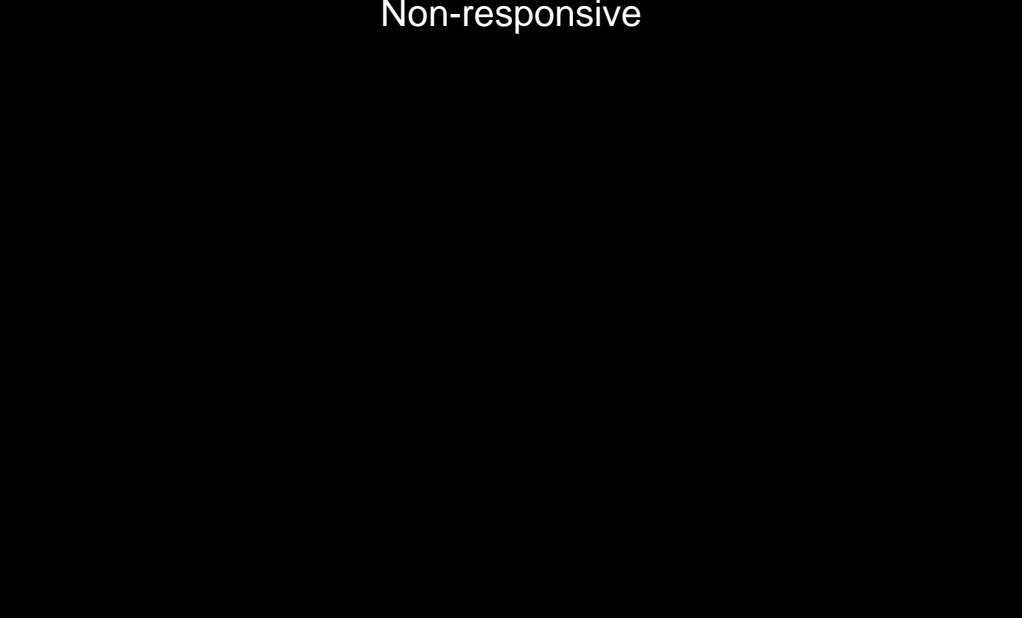
VALUATION

	Appraised	Assessed
Land Value	\$1,940.00	\$680.00
Improvements Value	\$0.00	\$0.00
Total Value	\$1,940.00	\$680.00
Taxable Value	\$680.00	

SALES

Sale Date	Sale Amount	Buyer	Conveyance	Notes
1/1/1992	\$0.00	SK HAND TOOL	0	

MAP



AGRICULTURAL

Code	Soil	Acres	Rate	Appraised	Assessed	CAUV	CAUV	Taxable
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LAND

Code	Frontage	Depth	Street Price	Depth Percent	Rate	Total	Value	Acres
A1 - PRIMARY	0	0/0	0	8900%	30000	\$4,410.00	\$1,940.00	0.147



Defiance County, Ohio - Property Record Card, Page 1  
Parcel: J090030E00600

GENERAL PARCEL INFORMATION

Owner	SK HAND TOOL CORPORATION
Property Address	135 HICKORY
Mailing Address	SK HAND TOOL CORPORATION
	4001 N RAVENSWOOD AVE SUITE 505
	CHICAGO IL 60613
Owner Address	340 MANUFACTURING AND ASSEMBLY (LIGHT)
	ENTERPRISE ADD BLK2 RICHL
Land Use	LOT 59 TO 76 INC 91-108
Legal Description	

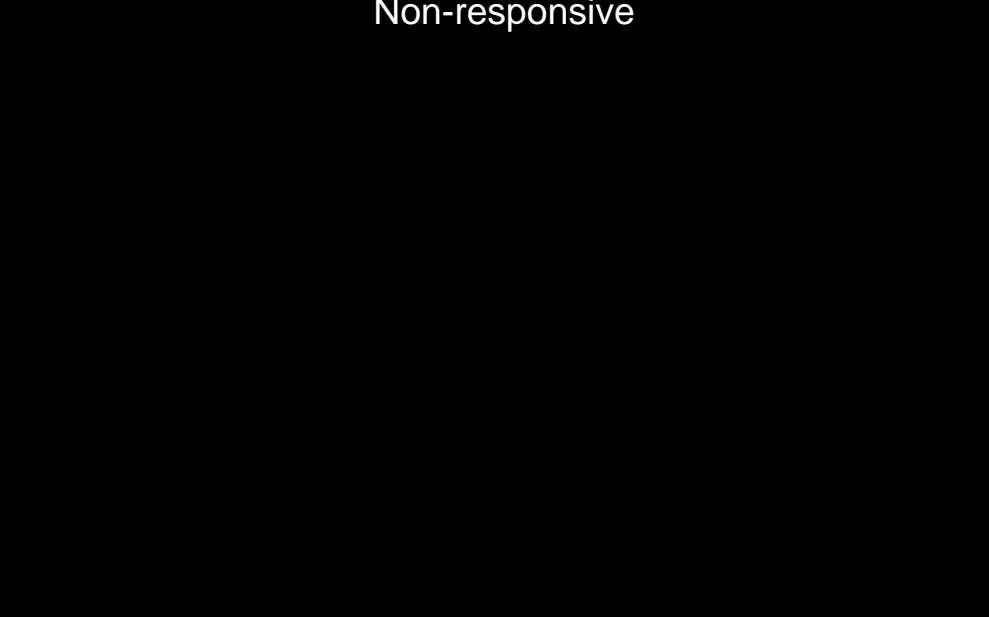
VALUATION

	Appraised	Assessed
Land Value	\$72,570.00	\$25,400.00
Improvements Value	\$325,500.00	\$113,930.00
Total Value	\$398,070.00	\$139,330.00
Taxable Value	\$139,330.00	

SALES

Sale Date	Sale Amount	Buyer	Conveyance	Notes
1/1/1992	\$0.00	SK HAND TOOL	0	

MAP



AGRICULTURAL

Code	Soil	Acres	Rate	Appraised	Assessed	CAUV	CAUV	Taxable
------	------	-------	------	-----------	----------	------	------	---------

LAND

Code	Frontage	Depth	Street Price	Depth Percent	Rate	Total	Value	Acres
A1 - PRIMARY	0	0/0	0	0%	30000	\$80,630.00	\$72,570.00	5.599

Card: 1

Owner	SK HAND TOOL CORPORATION
Property Address	135 HICKORY
Mailing Address	SK HAND TOOL CORPORATION 4001 N RAVENSWOOD AVE SUITE 505 CHICAGO IL 60613
Owner Address	340 MANUFACTURING AND ASSEMBLY (LIGHT) ENTERPRISE ADD BLK2 RICHL
Land Use	LOT 59 TO 76 INC 91-108
Legal Description	

	Appraised	Assessed
Land Value	\$72,570.00	\$25,400.00
Improvements Value	\$325,500.00	\$113,930.00
Total Value	\$398,070.00	\$139,330.00
Taxable Value	\$139,330.00	

**Scale: 5ft**

Item	Description	Area (sqft)
A	LT MFG/1s BRK/12/S 1.0 1910	143491
B	CONC	21600
C	FrGarUn	3140
D	Pump	9
E	Fence	9
F	BW	9
G	ASPH	21600

Business Name	SK Handtool Corp.
Description	LT MFG
Construction	MASONRY BEARING WALLS
# of Floors	1
Price Code	340.000
Height	12
Length	0
Width	0
Area	143491
Year Built	1910
Value	\$320,270.00
Grade	F
Condition	P
HVAC	SPACE WALL FURNACE
Exterior Wall	BRICK WOOD/METAL
Framing	CB/MASON
Roofing	GABLE/HIP SHED/FLAT METAL BUILT UP
Window	INSULATED
Foundation	CASEMENT
Canopy	SLAB
Doors	
Plumbing	PREENGINEERED
	STANDARD

Description	Construction Area	Year Built	Condition	Value
-------------	-------------------	------------	-----------	-------

Description	Construction Area	Year Built	Condition	Value	
A GARAGE:	D	3140	1920	P	\$5,230
A CB PUMP HOUSE	C	0	0		\$0
A PAVING: ASPHALT		21600	0		\$0
A PAVING: CONCRETE		21600	0		\$0
U FENCE: CHAINLINK MTL		0	0		\$0
U FENCE: BARB WIRE		0	0		\$0

**VAP PHASE I PROPERTY ASSESSMENT  
FORMER SK HAND TOOLS  
135 HICKORY STREET  
DEFIANCE, OHIO 43512  
KERAMIDA PROJECT NO. 15831**

**ATTACHMENT 2**

Figures and Photographs

Figure 1: Vicinity Map

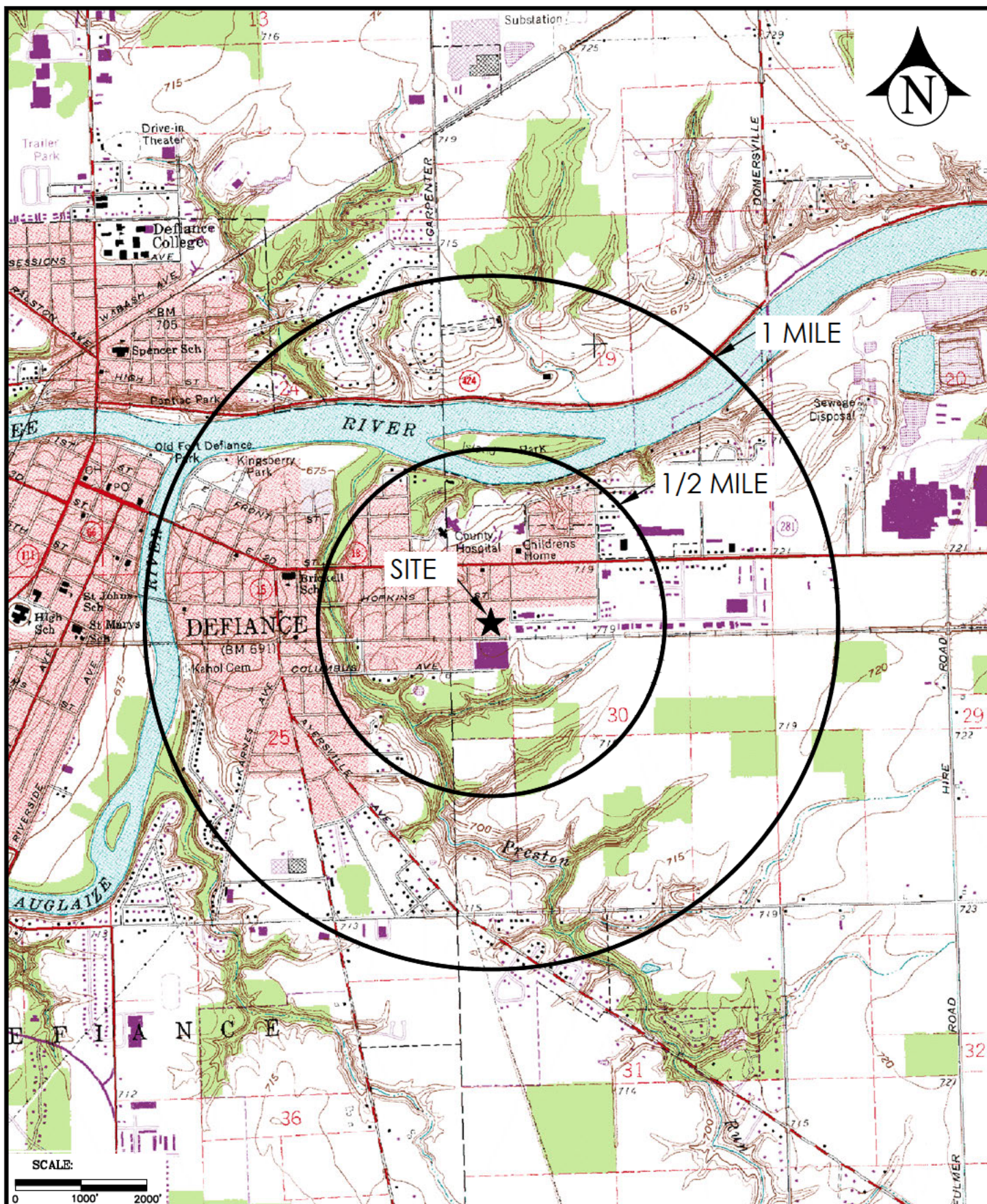
Figure 2: Annotated Aerial Photograph

Figure 3: Plant Layout Map

Figure 4: Identified Areas Map

Figure 5: Latitude/Longitude Coordinates Map  
Photographs Taken During Site Reconnaissance





Project: Former SK Hand Tools  
135 Hickory Street  
Defiance, Ohio

Figure 1

Site Vicinity Map



**KERAMIDA**  
Global EHS & Sustainability Services  
Engineers • Scientists • Planners

Project Number: 15831

Drawn By: J. DuMond

Date: June 19, 2014

Approved By: TS

File No. 15831\_Ph1

Non-responsive



Approximate Property Boundary



**KERAMIDA**  
Global EHS & Sustainability Services  
Engineers • Scientists • Planners

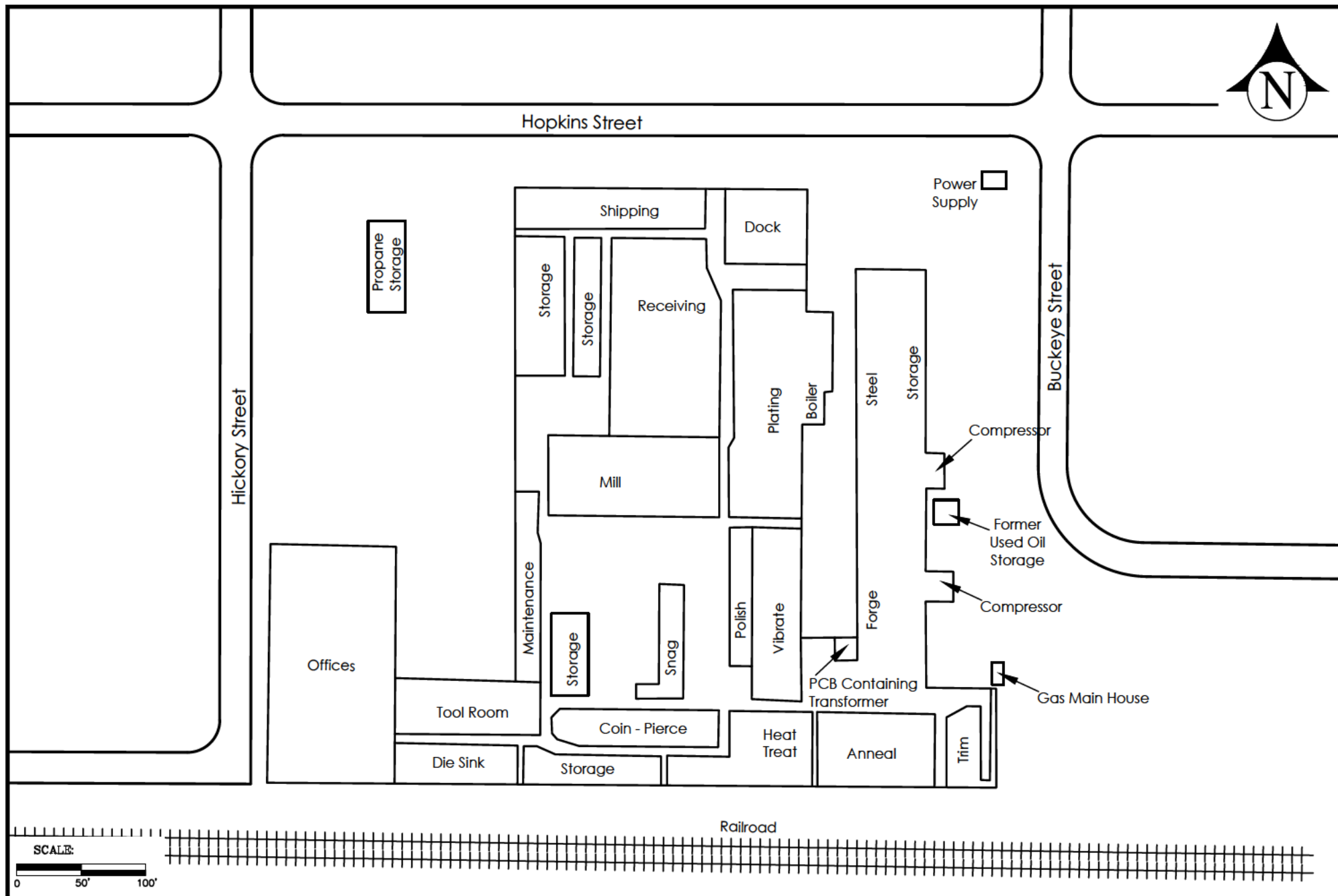
Project: Former SK Hand Tools  
135 Hickory Street  
Defiance, Ohio

Project Number: 15831	Drawn By: J. DuMond
Date: July 10, 2014	Approved By: TS
	File No. 15831_Ph1

Figure 2

Site Map





SCALE:



**KERAMIDA**  
Global EHS & Sustainability Services  
Engineers • Scientists • Planners

Project: Former SK Hand Tools  
135 Hickory Street  
Defiance, Ohio

Project Number: 15831

Date: July 10, 2014

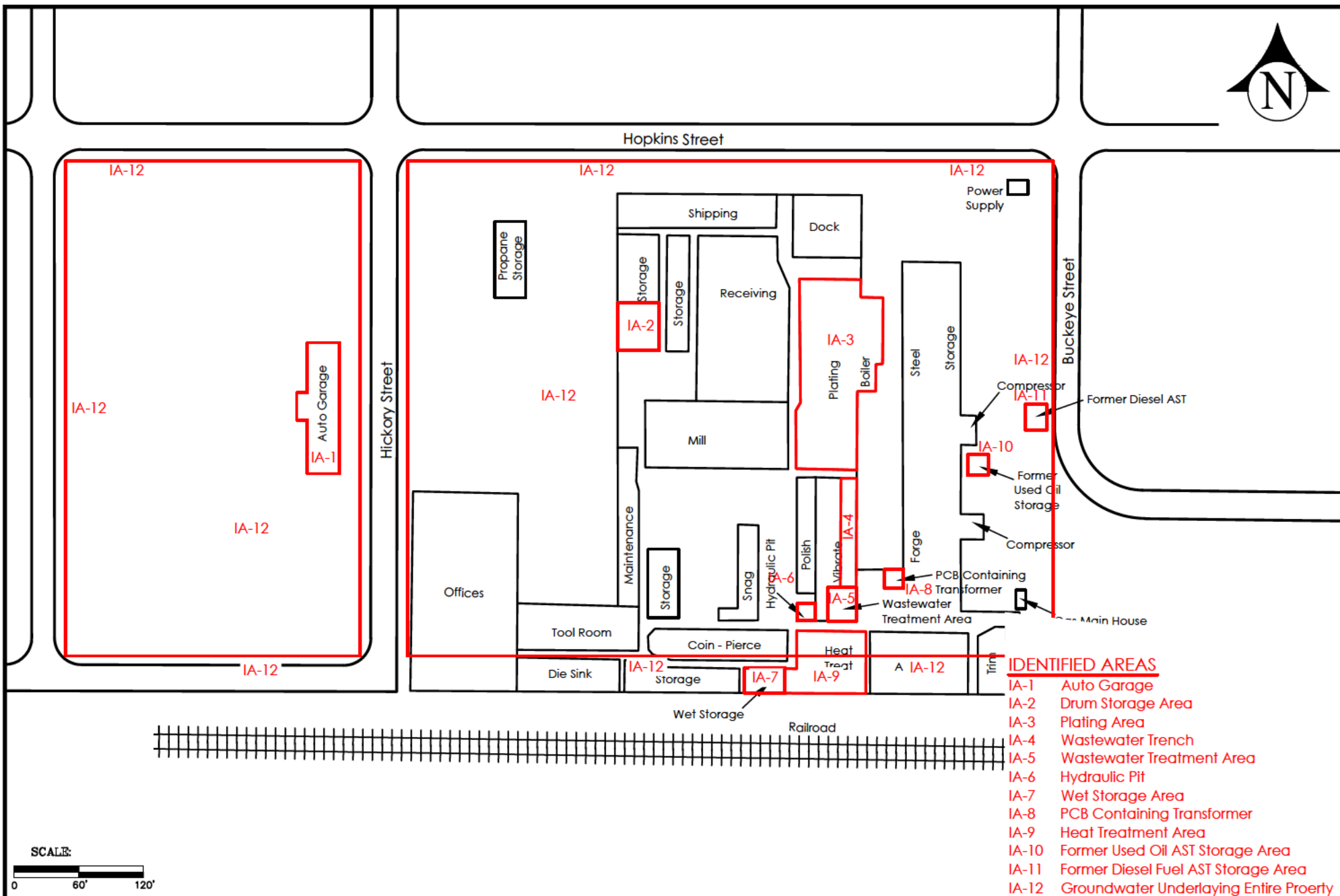
Drawn By: J. DuMond

Approved By: TS

File No. 15831\_Ph1

Figure 3

Plant Layout Map




	Project: Former SK Hand Tools 135 Hickory Street Defiance, Ohio	
	Project Number: 15831	Drawn By: J. DuMond
	Date: July 14, 2014	Approved By: TS
		File No. 15831_Ph1

Figure 4  
Identified Areas Map



Approximate Property Boundary



**KERAMIDA**  
Global EHS & Sustainability Services  
Engineers • Scientists • Planners

Project: Former SK Hand Tools  
135 Hickory Street  
Defiance, Ohio

Project Number: 15831	Drawn By: J. DuMond
Date: July 10, 2014	Approved By: TS
	File No. 15831_Ph1

Figure 5

Latitude/Longitude  
Coordinates Map



**VAP PHASE I PROPERTY ASSESSMENT  
FORMER SK HAND TOOLS  
135 HICKORY STREET  
DEFIANCE, OHIO 43512  
KERAMIDA PROJECT NO. 15831**

**ATTACHMENT 3**

EDR Historical Research Documentation  
Customized EDR Aerials and Maps by KERAMIDA  
EDR - Historical Aerial Photographs  
EDR - City Directories  
EDR - Historical Topographic Maps  
EDR - Sanborn Fire Insurance Maps



**135 Hickory Street**

135 Hickory Street

Defiance, OH 43512

Inquiry Number: 3974220.9

June 17, 2014

## The EDR Aerial Photo Decade Package



6 Armstrong Road, 4th Floor  
Shelton, Connecticut 06484  
Toll Free: 800.352.0050  
[www.edrnet.com](http://www.edrnet.com)

# EDR Aerial Photo Decade Package

Environmental Data Resources, Inc. (EDR) Aerial Photo Decade Package is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's professional researchers provide digitally reproduced historical aerial photographs, and when available, provide one photo per decade.

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**Date EDR Searched Historical Sources:**

Aerial Photography June 17, 2014

**Target Property:**

135 Hickory Street

Defiance, OH 43512

<u><i>Year</i></u>	<u><i>Scale</i></u>	<u><i>Details</i></u>	<u><i>Source</i></u>
1959	Aerial Photograph. Scale: 1"=500'	Panel #: 41084-C3, Defiance East, OH;Flight Date: April 22, 1959	EDR
1971	Aerial Photograph. Scale: 1"=500'	Panel #: 41084-C3, Defiance East, OH;Flight Date: January 01, 1971	EDR
1973	Aerial Photograph. Scale: 1"=500'	Panel #: 41084-C3, Defiance East, OH;Flight Date: January 12, 1973	EDR
1988	Aerial Photograph. Scale: 1"=750'	Panel #: 41084-C3, Defiance East, OH;Flight Date: April 08, 1988	EDR
1995	Aerial Photograph. Scale: 1"=500'	Panel #: 41084-C3, Defiance East, OH;DOQQ - acquisition dates: March 24, 1995	EDR
2000	Aerial Photograph. Scale: 1"=750'	Panel #: 41084-C3, Defiance East, OH;Flight Date: October 12, 2000	EDR
2005	Aerial Photograph. Scale: 1"=500'	Panel #: 41084-C3, Defiance East, OH;Flight Year: 2005	EDR
2006	Aerial Photograph. Scale: 1"=500'	Panel #: 41084-C3, Defiance East, OH;Flight Year: 2006	EDR
2009	Aerial Photograph. Scale: 1"=500'	Panel #: 41084-C3, Defiance East, OH;Flight Year: 2009	EDR
2010	Aerial Photograph. Scale: 1"=500'	Panel #: 41084-C3, Defiance East, OH;Flight Year: 2010	EDR
2011	Aerial Photograph. Scale: 1"=500'	Panel #: 41084-C3, Defiance East, OH;Flight Year: 2011	EDR



INQUIRY #: 3974220.9

YEAR: 1959

| = 500'







INQUIRY #: 3974220.9

YEAR: 1971

| = 500'





INQUIRY #: 3974220.9

YEAR: 1973

| = 500'







INQUIRY #: 3974220.9

YEAR: 1988

|————| = 750'







INQUIRY #: 3974220.9

YEAR: 1995

| = 500'





INQUIRY #: 3974220.9

YEAR: 2000

| = 750'







INQUIRY #: 3974220.9

YEAR: 2005

| = 500'







INQUIRY #: 3974220.9

YEAR: 2006

| = 500'







INQUIRY #: 3974220.9

YEAR: 2009

| = 500'







INQUIRY #: 3974220.9

YEAR: 2010

| = 500'







INQUIRY #: 3974220.9

YEAR: 2011

| = 500'





**135 Hickory Street**

135 Hickory Street  
Defiance, OH 43512

Inquiry Number: 3974220.5  
June 19, 2014

## The EDR-City Directory Image Report



## TABLE OF CONTENTS

### **SECTION**

**Executive Summary**

**Findings**

**City Directory Images**

***Thank you for your business.***

Please contact EDR at 1-800-352-0050  
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## EXECUTIVE SUMMARY

### DESCRIPTION

Environmental Data Resources, Inc.'s (EDR) City Directory Report is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's City Directory Report includes a search of available city directory data at 5 year intervals.

### RESEARCH SUMMARY

The following research sources were consulted in the preparation of this report. A check mark indicates where information was identified in the source and provided in this report.

<u>Year</u>	<u>Target Street</u>	<u>Cross Street</u>	<u>Source</u>
2013	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Cole Information Services
2008	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Cole Information Services
2003	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Cole Information Services
1999	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Cole Information Services
1973	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Robinson's City Directory
1962	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Polk's City Directory

### RECORD SOURCES

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## FINDINGS

### TARGET PROPERTY STREET

135 Hickory Street  
Defiance, OH 43512

<u>Year</u>	<u>CD Image</u>	<u>Source</u>
-------------	-----------------	---------------

### HICKORY ST

2013	pg A1	Cole Information Services
2008	pg A2	Cole Information Services
2003	pg A3	Cole Information Services
1999	pg A4	Cole Information Services
1973	pg A5	Robinson's City Directory
1962	pg A6	Po k's City Directory

## FINDINGS

### CROSS STREETS

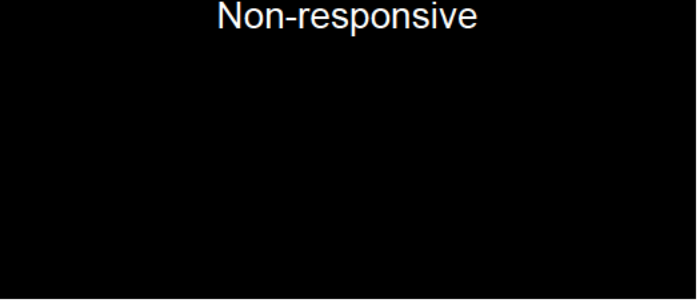
No Cross Streets Identified

## **City Directory Images**

**HICKORY ST**

**2013**

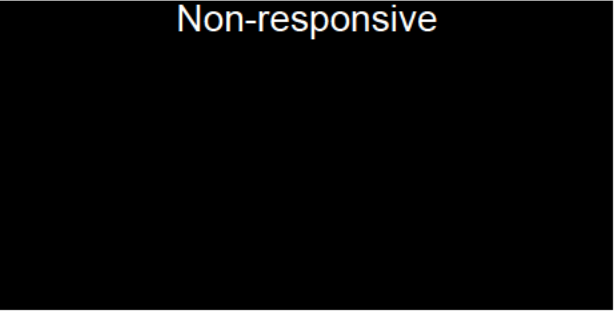
Non-responsive



**HICKORY ST**

**2008**


Non-responsive



**HICKORY ST**

**2003**

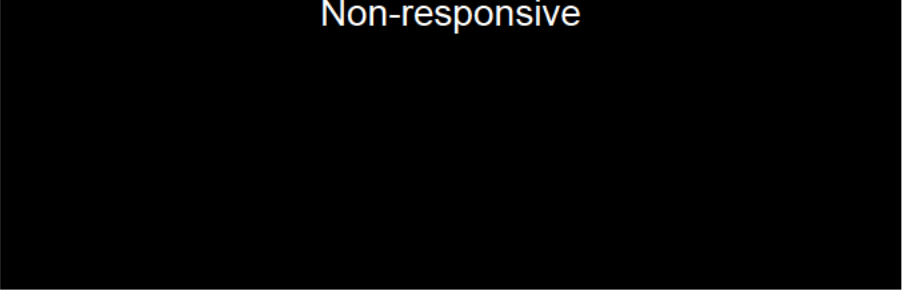
Non-responsive





**HICKORY ST 1999**

Non-responsive



HICKORY ST 1973  
Non-responsive



Non-responsive



**135 Hickory Street**

135 Hickory Street

Defiance, OH 43512

Inquiry Number: 3974220.3

June 18, 2014

## Certified Sanborn® Map Report



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Shelton, Connecticut 06484  
Toll Free: 800.352.0050  
[www.edrnet.com](http://www.edrnet.com)

## Certified Sanborn® Map Report

6/18/14

**Site Name:**

135 Hickory Street  
135 Hickory Street  
Defiance, OH 43512

**Client Name:**

Keramida Environmental, Inc.  
4722 Madison Road  
Cincinnati, OH 45227



EDR Inquiry # 3974220.3

Contact: Tim

The Sanborn Library has been searched by EDR and maps covering the target property location as provided by Keramida Environmental, Inc. were identified for the years listed below. The Sanborn Library is the largest, most complete collection of fire insurance maps. The collection includes maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow, and others. Only Environmental Data Resources Inc. (EDR) is authorized to grant rights for commercial reproduction of maps by the Sanborn Library LLC, the copyright holder for the collection. Results can be authenticated by visiting [www.edrnet.com/sanborn](http://www.edrnet.com/sanborn).

The Sanborn Library is continually enhanced with newly identified map archives. This report accesses all maps in the collection as of the day this report was generated.

### Certified Sanborn Results:

**Site Name:** 135 Hickory Street  
**Address:** 135 Hickory Street  
**City, State, Zip:** Defiance, OH 43512  
**Cross Street:**  
**P.O. #** NA  
**Project:** NA  
**Certification #** 9C3A-431D-8BC7



Sanborn® Library search results  
Certification # 9C3A-431D-8BC7

**Maps Provided:**

1961  
1946

The Sanborn Library includes more than 1.2 million fire insurance maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow and others which track historical property usage in approximately 12,000 American cities and towns. Collections searched:

- ☒ Library of Congress
- ☒ University Publications of America
- ☒ EDR Private Collection

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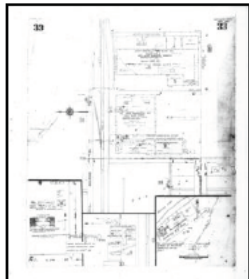
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## Sanborn Sheet Thumbnails

This Certified Sanborn Map Report is based upon the following Sanborn Fire Insurance map sheets.



### 1961 Source Sheets



Volume 1, Sheet 33



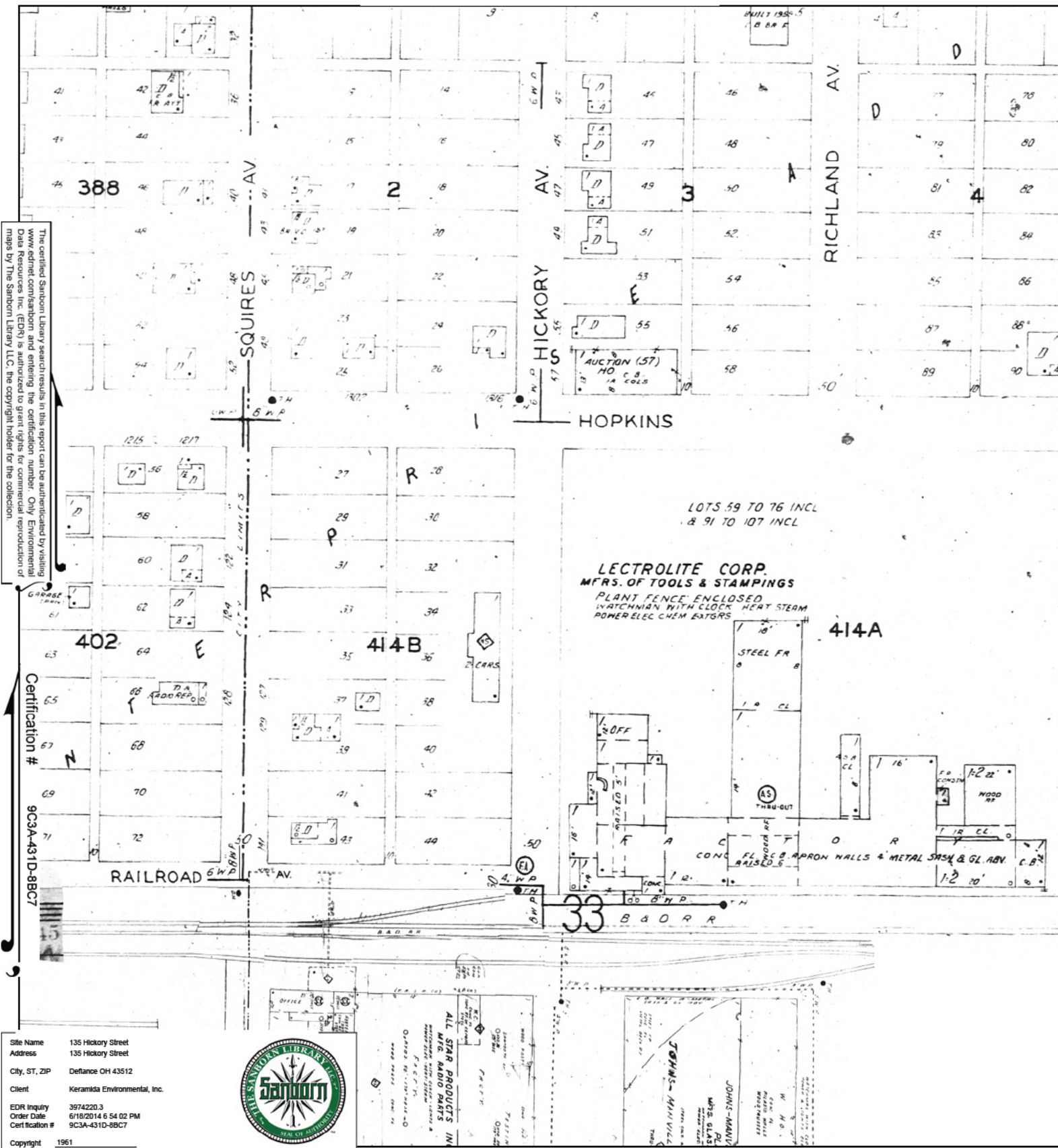
Volume 1, Sheet 38

### 1946 Source Sheets

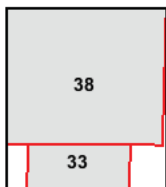


Volume 1, Sheet 33

## 1961 Certified Sanborn Map



This Certified Sanborn Map combines the following sheets.  
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Volume 1, Sheet 33  
Volume 1, Sheet 38



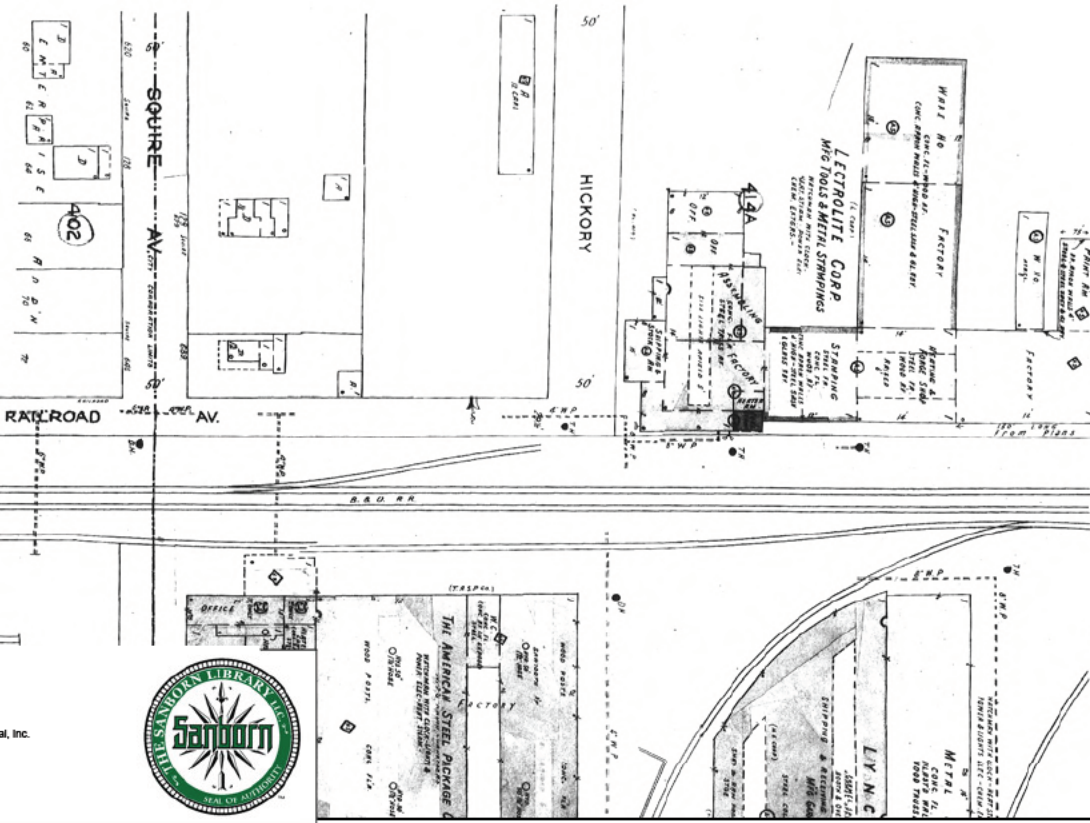


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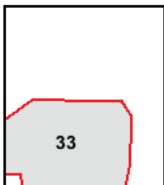
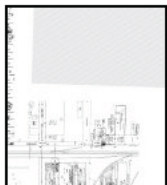
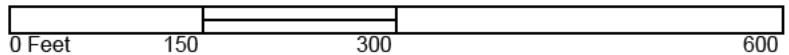
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22 Certification # 9C3A-431D-8BC7

Site Name 135 Hickory Street  
Address 135 Hickory Street  
City, ST, ZIP Defiance OH 43512  
Client Keramida Environmental, Inc.  
EDR Inquiry 3974220.3  
Order Date 6/18/2014 6 54 02 PM  
Certification # 9C3A-431D-8BC7  
Copyright 1946



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Outlined areas indicate map sheets within the collection.



Volume 1, Sheet 33







**135 Hickory Street**

135 Hickory Street

Defiance, OH 43512

Inquiry Number: 3974220.4

June 16, 2014

## EDR Historical Topographic Map Report



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Shelton, Connecticut 06484  
Toll Free: 800.352.0050  
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# EDR Historical Topographic Map Report

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***Thank you for your business.***  
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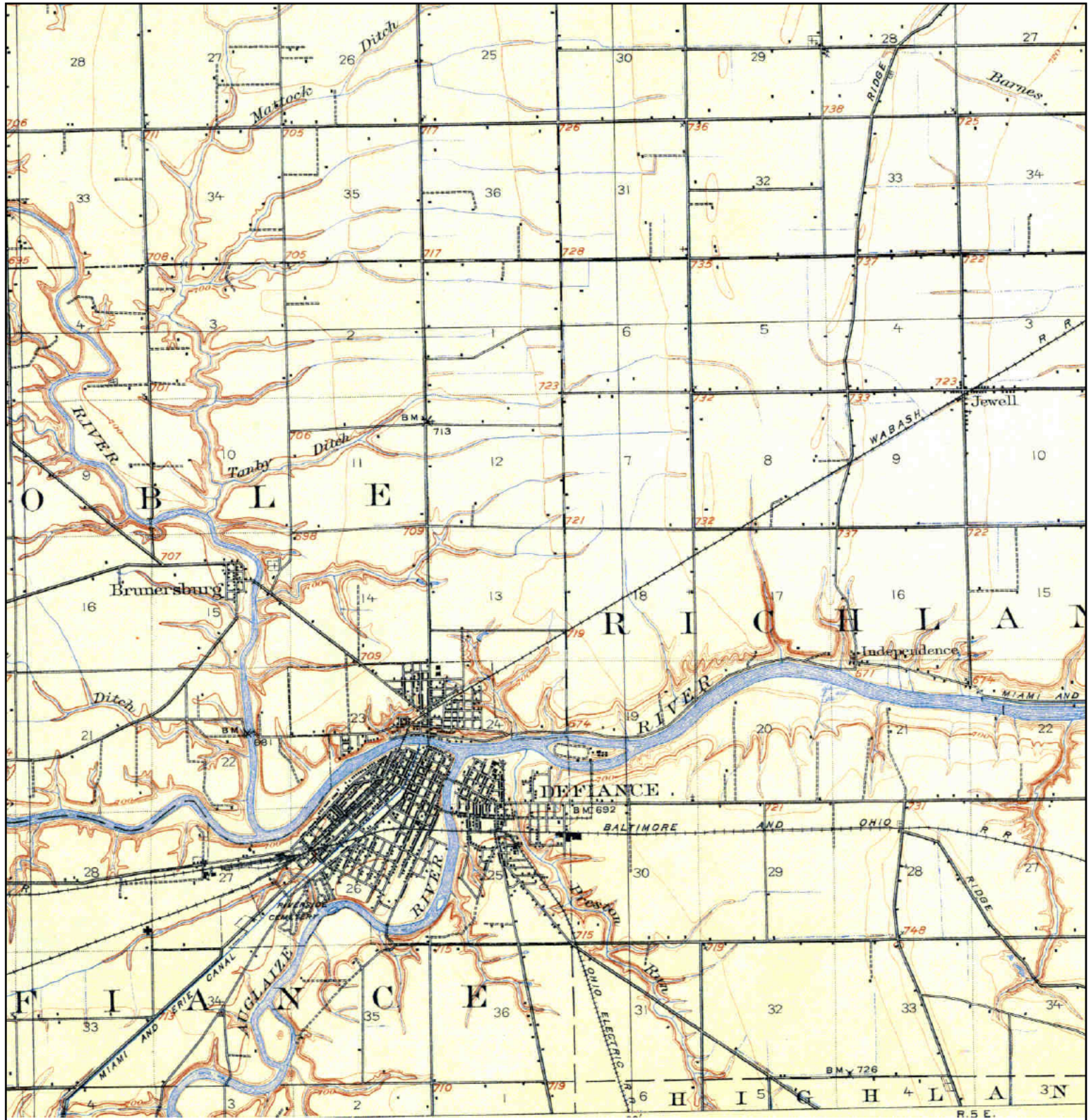
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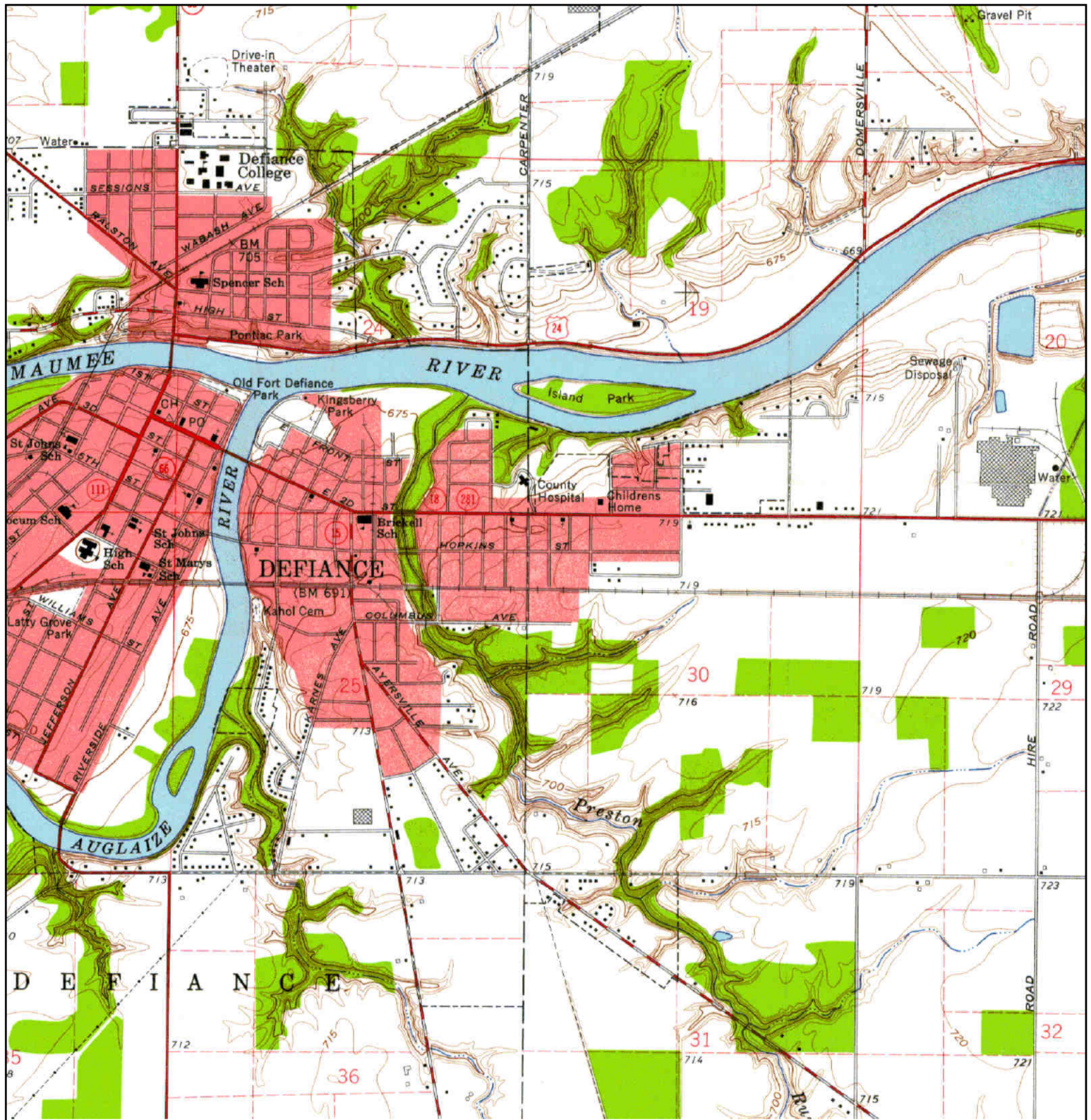
# Historical Topographic Map



<p>N ↑</p>	<p>TARGET QUAD: 28 NAME: DEFIANCE MAP YEAR: 1909  SERIES: 15 SCALE: 1:62500</p>	<p>SITE NAME: 135 Hickory Street ADDRESS: 135 Hickory Street Defiance, OH 43512 LAT/LONG: 41.2807 / -84.3406</p>	<p>CLIENT: Keramida Environmental, Inc. CONTACT: Tim INQUIRY#: 3974220.4 RESEARCH DATE: 06/16/2014</p>
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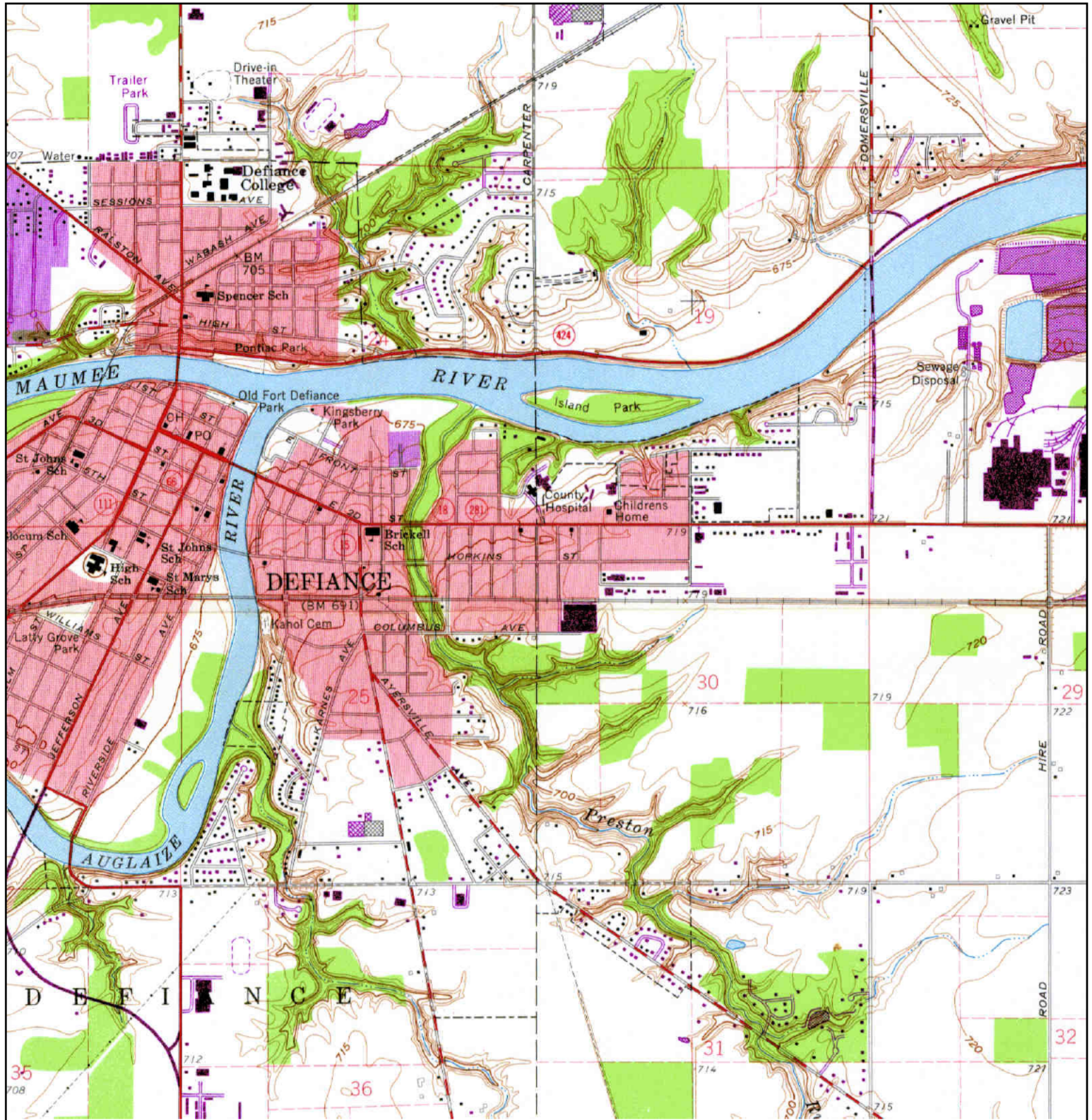
# Historical Topographic Map



<p>N ↑</p>	<p>TARGET QUAD: DEFANCE EAST MAP YEAR: 1959  SERIES: 7.5 SCALE: 1:24000</p>	<p>SITE NAME: 135 Hickory Street ADDRESS: 135 Hickory Street Defiance, OH 43512 LAT/LONG: 41.2807 / -84.3406</p>	<p>CLIENT: Keramida Environmental, Inc. CONTACT: Tim INQUIRY#: 3974220.4 RESEARCH DATE: 06/16/2014</p>
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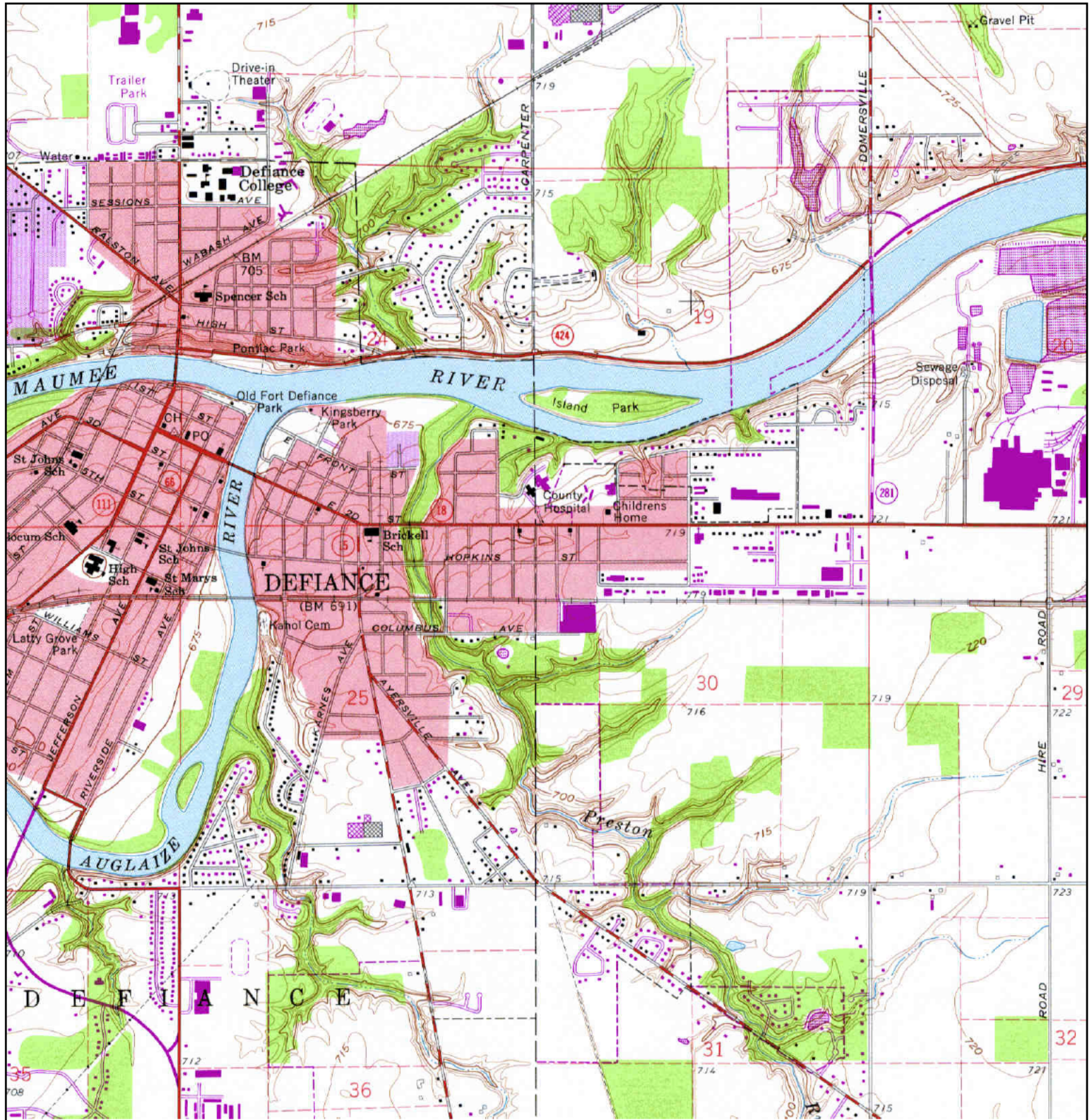
# Historical Topographic Map



<p>N ↑</p>	<p>TARGET QUAD: DEFANCE EAST MAP YEAR: 1971 PHOTO: 1959 SERIES: 7.5 SCALE: 1:24000</p>	<p>SITE NAME: 135 Hickory Street ADDRESS: 135 Hickory Street Defiance, OH 43512 LAT/LONG: 41.2807 / -84.3406</p>	<p>CLIENT: Keramida Environmental, Inc. CONTACT: Tim INQUIRY#: 3974220.4 RESEARCH DATE: 06/16/2014</p>
----------------	--	--	--



# Historical Topographic Map



<p>N ↑</p>	<p>TARGET QUAD: DEFiance EAST MAP YEAR: 1979 PHOTO: 1959 SERIES: 7.5 SCALE: 1:24000</p>	<p>SITE NAME: 135 Hickory Street ADDRESS: 135 Hickory Street Defiance, OH 43512 LAT/LONG: 41.2807 / -84.3406</p>	<p>CLIENT: Keramida Environmental, Inc. CONTACT: Tim INQUIRY#: 3974220.4 RESEARCH DATE: 06/16/2014</p>
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**VAP PHASE I PROPERTY ASSESSMENT  
FORMER SK HAND TOOLS  
135 HICKORY STREET  
DEFIANCE, OHIO 43512  
KERAMIDA PROJECT NO. 15831**

**ATTACHMENT 4**  
EDR Regulatory Database Report

**135 Hickory Street**

135 Hickory Street  
Defiance, OH 43512

Inquiry Number: 3974220.2s  
June 17, 2014

## The EDR Radius Map™ Report with GeoCheck®



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Shelton, CT 06484  
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***Thank you for your business.***  
Please contact EDR at 1-800-352-0050  
with any questions or comments.

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## EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-13) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

### TARGET PROPERTY INFORMATION

#### ADDRESS

135 HICKORY STREET  
DEFIANCE, OH 43512

#### COORDINATES

Latitude (North): 41.2807000 - 41° 16' 50.52"  
Longitude (West): 84.3406000 - 84° 20' 26.16"  
Universal Transverse Mercator: Zone 16  
UTM X (Meters): 722724.6  
UTM Y (Meters): 4573117.5  
Elevation: 713 ft. above sea level

### USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map: 41084-C3 DEFIANCE EAST, OH  
Most Recent Revision: 1979

### AERIAL PHOTOGRAPHY IN THIS REPORT

Photo Year: 2011  
Source: USDA

### TARGET PROPERTY SEARCH RESULTS

The target property was identified in the following records. For more information on this property see page 8 of the attached EDR Radius Map report:

Site	Database(s)	EPA ID
SK HAND TOOLS CORP. 135 HICKORY DEFIANCE, OH	OH RGA LUST	N/A
SK HAND TOOL CORP 135 HICKORY ST. DEFIANCE, OH	RCRA-LQG FINDS PA MANIFEST NY MANIFEST OH CRO	OHD045247350
SK HAND TOOLS CORP. 135 HICKORY DEFIANCE, OH 43512	OH LUST FR Status: Inactive FR Status: NFA: No Further Action Facility Status: Inactive FR Status: NFA: No Further Action OH UST	N/A

## EXECUTIVE SUMMARY

SK HAND TOOL CORP 135 HICKORY STREET DEFIANCE, OH 43512	PA MANIFEST	N/A
SK HAND TOOLS CORP. 135 HICKORY DEFIANCE, OH 43512	OH ARCHIVE UST OH NPDES	N/A
SK HAND TOOL SITE 135 HICKORY STREET DEFIANCE, OH 43512	CERCLIS	OHN000510633
SK HAND TOOL CORP 135 HICKORY ST DEFIANCE, OH	OH RGA LUST	N/A
SK TOOLS 135 HICKORY ST DEFIANCE, OH 43512	FTTS HIST FTTS	N/A
SK HAND TOOLS 135 HICKORY ST DEFIANCE, OH 43512	FTTS HIST FTTS	N/A
SK HAND TOOL CORP 135 HICKORY ST. DEFIANCE OH 43512 DEFIANCE, OH 43512	ICIS	N/A

### **DATABASES WITH NO MAPPED SITES**

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the search radius around the target property for the following databases:

### **STANDARD ENVIRONMENTAL RECORDS**

#### ***Federal NPL site list***

NPL..... National Priority List  
Proposed NPL..... Proposed National Priority List Sites  
NPL LIENS..... Federal Superfund Liens

#### ***Federal Delisted NPL site list***

Delisted NPL..... National Priority List Deletions

## EXECUTIVE SUMMARY

### ***Federal CERCLIS list***

FEDERAL FACILITY..... Federal Facility Site Information listing

### ***Federal CERCLIS NFRAP site List***

CERC-NFRAP..... CERCLIS No Further Remedial Action Planned

### ***Federal RCRA non-CORRACTS TSD facilities list***

RCRA-TSDF..... RCRA - Treatment, Storage and Disposal

### ***Federal RCRA generators list***

RCRA-CESQG..... RCRA - Conditionally Exempt Small Quantity Generator

### ***Federal institutional controls / engineering controls registries***

US ENG CONTROLS..... Engineering Controls Sites List

US INST CONTROL..... Sites with Institutional Controls

LUCIS..... Land Use Control Information System

### ***Federal ERNS list***

ERNS..... Emergency Response Notification System

### ***State- and tribal - equivalent CERCLIS***

OH SHWS..... This state does not maintain a SHWS list. See the Federal CERCLIS list and Federal NPL list.

OH DERR..... Division of Environmental Response and Revitalization Database

### ***State and tribal landfill and/or solid waste disposal site lists***

OH SWF/LF..... Licensed Solid Waste Facilities

### ***State and tribal leaking storage tank lists***

OH UNREG LTANKS..... Ohio Leaking UST File

INDIAN LUST..... Leaking Underground Storage Tanks on Indian Land

### ***State and tribal registered storage tank lists***

INDIAN UST..... Underground Storage Tanks on Indian Land

FEMA UST..... Underground Storage Tank Listing

### ***State and tribal institutional control / engineering control registries***

OH ENG CONTROLS..... Sites with Engineering Controls

OH INST CONTROL..... Sites with Institutional Engineering Controls

OH HIST INST CONTROLS... Institutional Controls Database

OH HIST ENG CONTROLS... Operation & Maintenance Agreements Database

### ***State and tribal voluntary cleanup sites***

OH VCP..... Voluntary Action Program Sites

## EXECUTIVE SUMMARY

INDIAN VCP..... Voluntary Cleanup Priority Listing

### ***State and tribal Brownfields sites***

OH BROWNFIELDS..... Ohio Brownfield Inventory

### **ADDITIONAL ENVIRONMENTAL RECORDS**

#### ***Local Brownfield lists***

US BROWNFIELDS..... A Listing of Brownfields Sites

#### ***Local Lists of Landfill / Solid Waste Disposal Sites***

DEBRIS REGION 9..... Torres Martinez Reservation Illegal Dump Site Locations

ODI..... Open Dump Inventory

OH HIST LF..... Old Solid Waste Landfill

OH SWRCY..... Recycling Facility Listing

INDIAN ODI..... Report on the Status of Open Dumps on Indian Lands

#### ***Local Lists of Hazardous waste / Contaminated Sites***

US CDL..... Clandestine Drug Labs

OH CDL..... Clandestine Drug Lab Locations

US HIST CDL..... National Clandestine Laboratory Register

#### ***Local Land Records***

LIENS 2..... CERCLA Lien Information

#### ***Records of Emergency Release Reports***

HMIRS..... Hazardous Materials Information Reporting System

OH SPILLS..... Emergency Response Database

OH SPILLS 80..... SPILLS 80 data from FirstSearch

OH SPILLS 90..... SPILLS 90 data from FirstSearch

#### ***Other Ascertainable Records***

DOT OPS..... Incident and Accident Data

DOD..... Department of Defense Sites

FUDS..... Formerly Used Defense Sites

CONSENT..... Superfund (CERCLA) Consent Decrees

ROD..... Records Of Decision

UMTRA..... Uranium Mill Tailings Sites

US MINES..... Mines Master Index File

TRIS..... Toxic Chemical Release Inventory System

TSCA..... Toxic Substances Control Act

SSTS..... Section 7 Tracking Systems

PADS..... PCB Activity Database System

RADINFO..... Radiation Information Database

RAATS..... RCRA Administrative Action Tracking System

RMP..... Risk Management Plans

OH TOWNGAS..... DERR Towngas Database

## EXECUTIVE SUMMARY

OH UIC.....	Underground Injection Wells Listing
OH DRYCLEANERS.....	Drycleaner Facility Listing
OH AIRS.....	Title V Permits Listing
OH USD.....	Urban Setting Designation Sites
OH HIST USD.....	Urban Setting Designations Database
INDIAN RESERV.....	Indian Reservations
SCRD DRYCLEANERS.....	State Coalition for Remediation of Drycleaners Listing
OH COAL ASH.....	Coal Ash Disposal Site Listing
OH Financial Assurance.....	Financial Assurance Information Listing
2020 COR ACTION.....	2020 Corrective Action Program List
PCB TRANSFORMER.....	PCB Transformer Registration Database
US AIRS.....	Aerometric Information Retrieval System Facility Subsystem
PRP.....	Potentially Responsible Parties
COAL ASH EPA.....	Coal Combustion Residues Surface Impoundments List
LEAD SMELTERS.....	Lead Smelter Sites
EPA WATCH LIST.....	EPA WATCH LIST
COAL ASH DOE.....	Steam-Electric Plant Operation Data
US FIN ASSUR.....	Financial Assurance Information

### EDR HIGH RISK HISTORICAL RECORDS

#### ***EDR Exclusive Records***

EDR MGP.....	EDR Proprietary Manufactured Gas Plants
EDR US Hist Auto Stat.....	EDR Exclusive Historic Gas Stations
EDR US Hist Cleaners.....	EDR Exclusive Historic Dry Cleaners

### EDR RECOVERED GOVERNMENT ARCHIVES

#### ***Exclusive Recovered Govt. Archives***

OH RGA LF.....	Recovered Government Archive Solid Waste Facilities List
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### SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified in the following databases.

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property.

Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in ***bold italics*** are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

### STANDARD ENVIRONMENTAL RECORDS

#### ***Federal RCRA CORRACTS facilities list***

## EXECUTIVE SUMMARY

**CORRACTS:** CORRACTS is a list of handlers with RCRA Corrective Action Activity. This report shows which nationally-defined corrective action core events have occurred for every handler that has had corrective action activity.

A review of the CORRACTS list, as provided by EDR, and dated 03/11/2014 has revealed that there is 1 CORRACTS site within approximately 1 mile of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<b>INTEGRITY DEFIANCE AUTO BODY</b>	<b>1956 SPRUCE ST</b>	<b>E 1/2 - 1 (0.760 mi.)</b>	<b>16</b>	<b>69</b>

### ***Federal RCRA generators list***

**RCRA-SQG:** RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month.

A review of the RCRA-SQG list, as provided by EDR, and dated 03/11/2014 has revealed that there is 1 RCRA-SQG site within approximately 0.25 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<b>JOHNS MANVILLE INTERNATIONAL I</b>	<b>COLUMBUS AVE</b>	<b>S 1/8 - 1/4 (0.171 mi.)</b>	<b>11</b>	<b>58</b>

### ***State and tribal leaking storage tank lists***

**OH LUST:** The Leaking Underground Storage Tank Incident Reports contain an inventory of reported leaking underground storage tank incidents. The data come from the Department of Commerce Division of State Fire Marshal's List of Reported Petroleum Underground Storage Tank Release Incidents.

A review of the OH LUST list, as provided by EDR, and dated 02/16/2014 has revealed that there are 3 OH LUST sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<b>FORMER SOHIO #06534</b> FR Status: Inactive FR Status: NFA: No Further Action Facility Status: Inactive FR Status: NFA: No Further Action	<b>1747 E 2ND ST</b>	<b>ENE 1/4 - 1/2 (0.344 mi.)</b>	<b>14</b>	<b>66</b>
<b>WAYNE GLORE TRUCKING, INC.</b> FR Status: Inactive FR Status: NFA: No Further Action Facility Status: Inactive FR Status: NFA: No Further Action	<b>1790 SPRUCE ST</b>	<b>E 1/4 - 1/2 (0.357 mi.)</b>	<b>15</b>	<b>66</b>
<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<b>DEFIANCE HOSPITAL, INC.</b> FR Status: Inactive FR Status: NFA: No Further Action Facility Status: Inactive FR Status: NFA: No Further Action	<b>1206 E 2ND ST</b>	<b>NW 1/8 - 1/4 (0.174 mi.)</b>	<b>B12</b>	<b>61</b>

## EXECUTIVE SUMMARY

### ***State and tribal registered storage tank lists***

OH UST: The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the Department of Commerce Division of State Fire Marshal's Facility File.

A review of the OH UST list, as provided by EDR, and dated 05/18/2014 has revealed that there is 1 OH UST site within approximately 0.25 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<b>DEFIANCE HOSPITAL, INC.</b>	<b>1206 E 2ND ST</b>	<b>NW 1/8 - 1/4 (0.174 mi.)</b>	<b>B12</b>	<b>61</b>

### **ADDITIONAL ENVIRONMENTAL RECORDS**

### ***Local Lists of Registered Storage Tanks***

OH ARCHIVE UST: Underground storage tank records that have been removed from the Underground Storage Tank database.

A review of the OH ARCHIVE UST list, as provided by EDR, and dated 05/18/2014 has revealed that there is 1 OH ARCHIVE UST site within approximately 0.25 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<b>DEFIANCE HOSPITAL INC</b>	<b>1206 E SECOND ST</b>	<b>NW 1/8 - 1/4 (0.174 mi.)</b>	<b>B13</b>	<b>62</b>

### ***Other Ascertainable Records***

RCRA NonGen / NLR: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

A review of the RCRA NonGen / NLR list, as provided by EDR, and dated 03/11/2014 has revealed that there is 1 RCRA NonGen / NLR site within approximately 0.25 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<b>DEFIANCE HOSPITAL INC</b>	<b>1206 E SECOND ST</b>	<b>NW 1/8 - 1/4 (0.174 mi.)</b>	<b>B13</b>	<b>62</b>

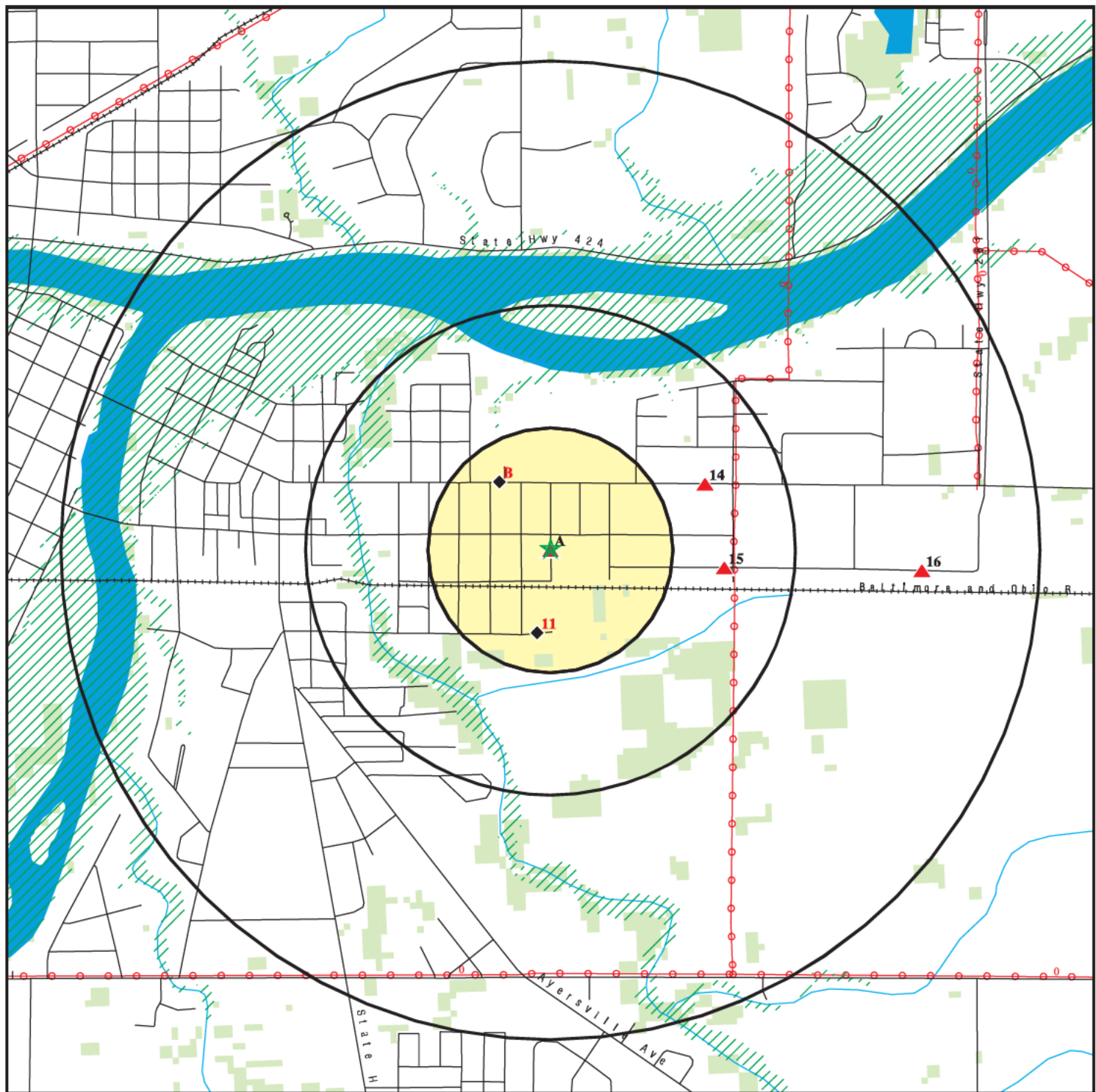


## EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped. Count: 20 records.

<u>Site Name</u>	<u>Database(s)</u>
WANETA KOCHER	OH ARCHIVE UST
CABBAGE PATCH CONVENIENCE STORE	OH LUST, OH UST, OH ARCHIVE UST
WEBB BROS.	OH ARCHIVE UST
ODNR INDEPENDENCE DAM STATE PARK	OH ARCHIVE UST
HIGHLAND MOBILE PARK LLC	OH ARCHIVE UST
WILLIAM HOHENBERGER	OH ARCHIVE UST
ANR PIPELINE	CERC-NFRAP, OH DERR
MEL CHAPMAN PROPERTY	OH LUST
ROYAL MART	OH LUST
WANETA KOCHER	OH UST
MOATS MARK FORD	RCRA-SQG
INTEGRITY MOTOR SALES INC	RCRA-SQG
STONECO INC DEFIANCE PLANT	RCRA-SQG, FINDS
MATLACK INC - DEFIANCE OH SPILL	RCRA-LQG
WEBB BROS TRUCKING AND EXCAVATING	RCRA NonGen / NLR
SNS EXPRESS	RCRA NonGen / NLR
INTEGRITY DEFIANCE AUTO BODY	RCRA NonGen / NLR, FINDS
PERRY STREET HOME SITE	FINDS
PERRY STREET HOME SITE	US BROWNFIELDS
BP BULK FACILITY SITE 69289	OH DERR

# OVERVIEW MAP - 3974220.2s



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Manufactured Gas Plants
- National Priority List Sites
- Dept. Defense Sites

- Indian Reservations BIA
- Power transmission lines
- Oil & Gas pipelines from USGS
- 100-year flood zone
- 500-year flood zone
- National Wetland Inventory
- State Wetlands

0 1/4 1/2 1 Miles

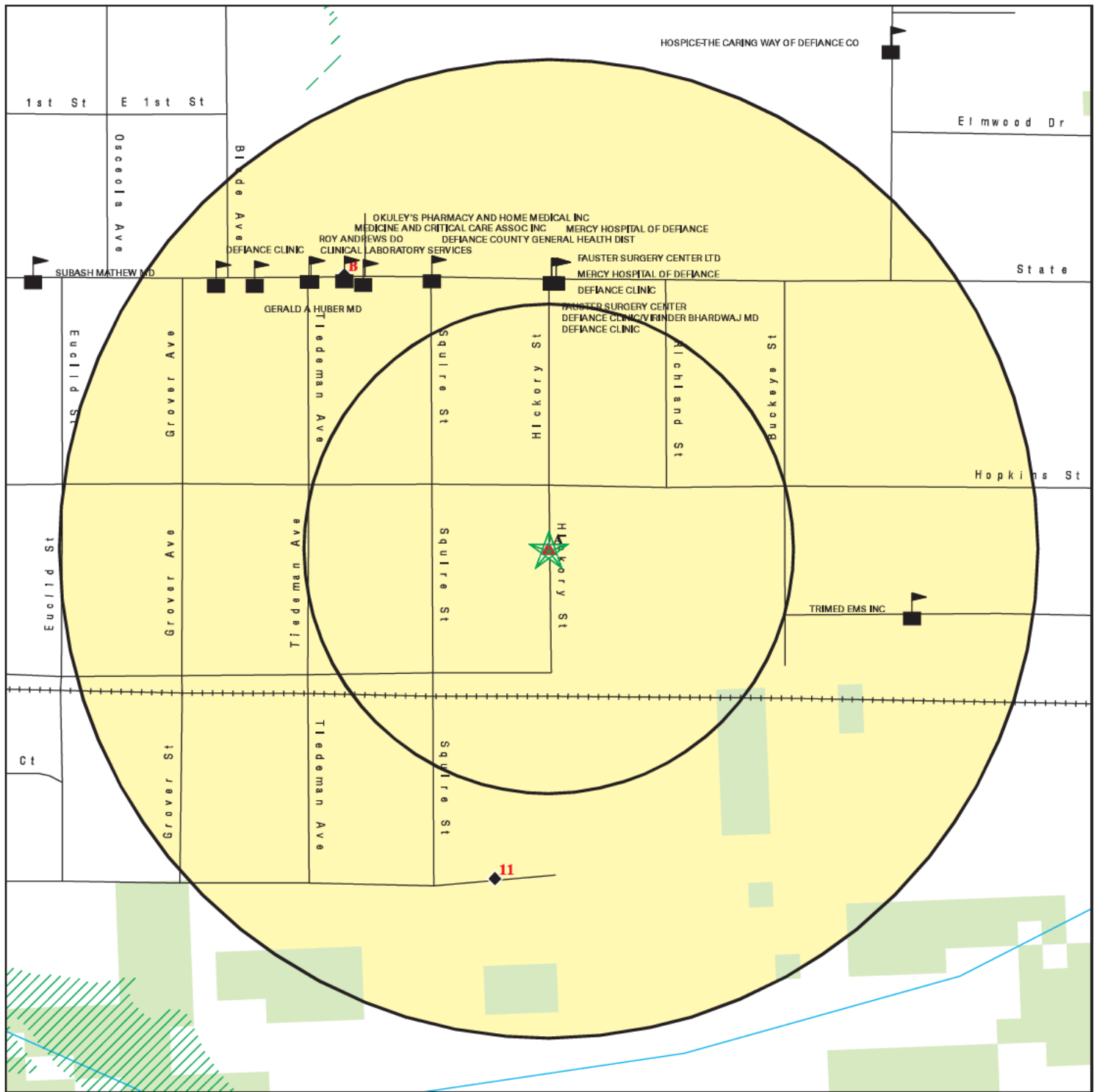


This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: 135 Hickory Street  
ADDRESS: 135 Hickory Street  
Deftance OH 43512  
LAT/LONG: 41.2807 / 84.3406

CLIENT: Keramida Environmental, Inc.  
CONTACT: Tim  
INQUIRY #: 3974220.2s  
DATE: June 17, 2014 2:53 pm

# DETAIL MAP - 3974220.2s



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Manufactured Gas Plants
- Sensitive Receptors
- National Priority List Sites
- Dept. Defense Sites

- Indian Reservations BIA
- Oil & Gas pipelines from USGS
- 100-year flood zone
- 500-year flood zone
- National Wetland Inventory
- State Wetlands

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: 135 Hickory Street  
 ADDRESS: 135 Hickory Street  
 Defiance OH 43512  
 LAT/LONG: 41.2807 / 84.3406

CLIENT: Keramida Environmental, Inc.  
 CONTACT: Tim  
 INQUIRY #: 3974220.2s  
 DATE: June 17, 2014 3:02 pm

## MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
<b>STANDARD ENVIRONMENTAL RECORDS</b>								
<b><i>Federal NPL site list</i></b>								
NPL	1.000		0	0	0	0	NR	0
Proposed NPL	1.000		0	0	0	0	NR	0
NPL LIENS	TP		NR	NR	NR	NR	NR	0
<b><i>Federal Delisted NPL site list</i></b>								
Delisted NPL	1.000		0	0	0	0	NR	0
<b><i>Federal CERCLIS list</i></b>								
CERCLIS	0.500	1	0	0	0	NR	NR	1
FEDERAL FACILITY	0.500		0	0	0	NR	NR	0
<b><i>Federal CERCLIS NFRAP site List</i></b>								
CERC-NFRAP	0.500		0	0	0	NR	NR	0
<b><i>Federal RCRA CORRACTS facilities list</i></b>								
CORRACTS	1.000		0	0	0	1	NR	1
<b><i>Federal RCRA non-CORRACTS TSD facilities list</i></b>								
RCRA-TSDF	0.500		0	0	0	NR	NR	0
<b><i>Federal RCRA generators list</i></b>								
RCRA-LQG	0.250	1	0	0	NR	NR	NR	1
RCRA-SQG	0.250		0	1	NR	NR	NR	1
RCRA-CESQG	0.250		0	0	NR	NR	NR	0
<b><i>Federal institutional controls / engineering controls registries</i></b>								
US ENG CONTROLS	0.500		0	0	0	NR	NR	0
US INST CONTROL	0.500		0	0	0	NR	NR	0
LUCIS	0.500		0	0	0	NR	NR	0
<b><i>Federal ERNS list</i></b>								
ERNS	TP		NR	NR	NR	NR	NR	0
<b><i>State- and tribal - equivalent CERCLIS</i></b>								
OH SHWS	N/A		N/A	N/A	N/A	N/A	N/A	N/A
OH DERR	1.000		0	0	0	0	NR	0
<b><i>State and tribal landfill and/or solid waste disposal site lists</i></b>								
OH SWF/LF	0.500		0	0	0	NR	NR	0
<b><i>State and tribal leaking storage tank lists</i></b>								
OH LUST	0.500	1	0	1	2	NR	NR	4
OH UNREG LTANKS	0.500		0	0	0	NR	NR	0
INDIAN LUST	0.500		0	0	0	NR	NR	0

## MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
<b>State and tribal registered storage tank lists</b>								
OH UST	0.250	1	0	1	NR	NR	NR	2
INDIAN UST	0.250		0	0	NR	NR	NR	0
FEMA UST	0.250		0	0	NR	NR	NR	0
<b>State and tribal institutional control / engineering control registries</b>								
OH ENG CONTROLS	0.500		0	0	0	NR	NR	0
OH INST CONTROL	0.500		0	0	0	NR	NR	0
OH HIST INST CONTROLS	0.500		0	0	0	NR	NR	0
OH HIST ENG CONTROLS	0.500		0	0	0	NR	NR	0
<b>State and tribal voluntary cleanup sites</b>								
OH VCP	0.500		0	0	0	NR	NR	0
INDIAN VCP	0.500		0	0	0	NR	NR	0
<b>State and tribal Brownfields sites</b>								
OH BROWNFIELDS	0.500		0	0	0	NR	NR	0
<b>ADDITIONAL ENVIRONMENTAL RECORDS</b>								
<b>Local Brownfield lists</b>								
US BROWNFIELDS	0.500		0	0	0	NR	NR	0
<b>Local Lists of Landfill / Solid Waste Disposal Sites</b>								
DEBRIS REGION 9	0.500		0	0	0	NR	NR	0
ODI	0.500		0	0	0	NR	NR	0
OH HIST LF	0.500		0	0	0	NR	NR	0
OH SWRCY	0.500		0	0	0	NR	NR	0
INDIAN ODI	0.500		0	0	0	NR	NR	0
<b>Local Lists of Hazardous waste / Contaminated Sites</b>								
US CDL	TP		NR	NR	NR	NR	NR	0
OH CDL	TP		NR	NR	NR	NR	NR	0
US HIST CDL	TP		NR	NR	NR	NR	NR	0
<b>Local Lists of Registered Storage Tanks</b>								
OH ARCHIVE UST	0.250	1	0	1	NR	NR	NR	2
<b>Local Land Records</b>								
LIENS 2	TP		NR	NR	NR	NR	NR	0
<b>Records of Emergency Release Reports</b>								
HMIRS	TP		NR	NR	NR	NR	NR	0
OH SPILLS	TP		NR	NR	NR	NR	NR	0
OH SPILLS 80	TP		NR	NR	NR	NR	NR	0
OH SPILLS 90	TP		NR	NR	NR	NR	NR	0



## MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
<b>Other Ascertainable Records</b>								
RCRA NonGen / NLR	0.250		0	1	NR	NR	NR	1
DOT OPS	TP		NR	NR	NR	NR	NR	0
DOD	1.000		0	0	0	0	NR	0
FUDS	1.000		0	0	0	0	NR	0
CONSENT	1.000		0	0	0	0	NR	0
ROD	1.000		0	0	0	0	NR	0
UMTRA	0.500		0	0	0	NR	NR	0
US MINES	0.250		0	0	NR	NR	NR	0
TRIS	TP		NR	NR	NR	NR	NR	0
TSCA	TP		NR	NR	NR	NR	NR	0
FTTS	TP	2	NR	NR	NR	NR	NR	2
HIST FTTS	TP	2	NR	NR	NR	NR	NR	2
SSTS	TP		NR	NR	NR	NR	NR	0
ICIS	TP	1	NR	NR	NR	NR	NR	1
PADS	TP		NR	NR	NR	NR	NR	0
MLTS	TP		NR	NR	NR	NR	NR	0
RADINFO	TP		NR	NR	NR	NR	NR	0
FINDS	TP	1	NR	NR	NR	NR	NR	1
RAATS	TP		NR	NR	NR	NR	NR	0
RMP	TP		NR	NR	NR	NR	NR	0
OH TOWNGAS	1.000		0	0	0	0	NR	0
OH UIC	TP		NR	NR	NR	NR	NR	0
NY MANIFEST	0.250	1	0	0	NR	NR	NR	1
PA MANIFEST	0.250	2	0	0	NR	NR	NR	2
OH DRYCLEANERS	0.250		0	0	NR	NR	NR	0
OH NPDES	TP	1	NR	NR	NR	NR	NR	1
OH AIRS	TP		NR	NR	NR	NR	NR	0
OH USD	0.500		0	0	0	NR	NR	0
OH HIST USD	0.500		0	0	0	NR	NR	0
INDIAN RESERV	1.000		0	0	0	0	NR	0
SCRD DRYCLEANERS	0.500		0	0	0	NR	NR	0
OH COAL ASH	0.500		0	0	0	NR	NR	0
OH CRO	TP	1	NR	NR	NR	NR	NR	1
OH Financial Assurance	TP		NR	NR	NR	NR	NR	0
2020 COR ACTION	0.250		0	0	NR	NR	NR	0
PCB TRANSFORMER	TP		NR	NR	NR	NR	NR	0
US AIRS	TP		NR	NR	NR	NR	NR	0
PRP	TP		NR	NR	NR	NR	NR	0
COAL ASH EPA	0.500		0	0	0	NR	NR	0
LEAD SMELTERS	TP		NR	NR	NR	NR	NR	0
EPA WATCH LIST	TP		NR	NR	NR	NR	NR	0
COAL ASH DOE	TP		NR	NR	NR	NR	NR	0
US FIN ASSUR	TP		NR	NR	NR	NR	NR	0

### EDR HIGH RISK HISTORICAL RECORDS

#### **EDR Exclusive Records**

EDR MGP	1.000		0	0	0	0	NR	0
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## MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
EDR US Hist Auto Stat	0.250		0	0	NR	NR	NR	0
EDR US Hist Cleaners	0.250		0	0	NR	NR	NR	0

### **EDR RECOVERED GOVERNMENT ARCHIVES**

#### ***Exclusive Recovered Govt. Archives***

OH RGA LUST	TP	2	NR	NR	NR	NR	NR	2
OH RGA LF	TP		NR	NR	NR	NR	NR	0

#### **NOTES:**

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

N/A = This State does not maintain a SHWS list. See the Federal CERCLIS list.

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**A1**  
**Target**  
**Property**  
**SK HAND TOOLS CORP.**  
**135 HICKORY**  
**DEFIANCE, OH**

**OH RGA LUST**  
**S114788492**  
**N/A**

**Site 1 of 10 in cluster A**

**Actual:**  
**713 ft.**

RGALUST:

2012	SK HAND TOOLS CORP.	135 HICKORY
2011	SK HAND TOOLS CORP.	135 HICKORY
2010	SK HAND TOOLS CORP.	135 HICKORY
2009	SK HAND TOOLS CORP.	135 HICKORY
2008	SK HAND TOOLS CORP.	135 HICKORY
2007	SK HAND TOOLS CORP.	135 HICKORY
2006	SK HAND TOOLS CORP.	135 HICKORY
2005	SK HAND TOOLS CORP.	135 HICKORY
2004	SK HAND TOOLS CORP.	135 HICKORY
2003	SK HAND TOOLS CORP.	135 HICKORY
2002	SK HAND TOOLS CORP.	135 HICKORY
2001	SK HAND TOOLS CORP.	135 HICKORY
2000	SK HAND TOOLS CORP.	135 HICKORY

**A2**  
**Target**  
**Property**  
**SK HAND TOOL CORP**  
**135 HICKORY ST.**  
**DEFIANCE, OH**

**RCRA-LQG**  
**FINDS**  
**PA MANIFEST**  
**NY MANIFEST**  
**OH CRO**  
**1000239478**  
**OHD045247350**

**Site 2 of 10 in cluster A**

**Actual:**  
**713 ft.**

RCRA-LQG:

Date form received by agency: 03/02/2010  
Facility name: SK HAND TOOL CORPORATION  
Facility address: 135 HICKORY ST  
DEFIANCE, OH 43512  
EPA ID: OHD045247350  
Contact: RODNEY GIESIGE  
Contact address: Not reported  
Not reported  
Contact country: US  
Contact telephone: (419) 784-1122  
Contact email: RGIESIGE@SKHANDTOOL.COM  
EPA Region: 05  
Land type: Private  
Classification: Large Quantity Generator  
Description: Handler: generates 1,000 kg or more of hazardous waste during any calendar month; or generates more than 1 kg of acutely hazardous waste during any calendar month; or generates more than 100 kg of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste during any calendar month; or generates 1 kg or less of acutely hazardous waste during any calendar month, and accumulates more than 1 kg of acutely hazardous waste at any time; or generates 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste during any calendar month, and accumulates more than 100 kg of that material at any time

Owner/Operator Summary:

Owner/operator name: SK HAND TOOL CORP  
Owner/operator address: 3535 W 47TH ST  
CHICAGO, IL 60632  
Owner/operator country: US

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Owner/operator telephone: (708) 485-6683  
Legal status: Private  
Owner/Operator Type: Owner  
Owner/Op start date: 01/01/2005  
Owner/Op end date: Not reported  
  
Owner/operator name: SK HAND TOOL CORP  
Owner/operator address: 3535 W 47TH ST  
CHICAGO, IL 60632  
  
Owner/operator country: US  
Owner/operator telephone: (708) 485-6683  
Legal status: Private  
Owner/Operator Type: Operator  
Owner/Op start date: 01/01/2005  
Owner/Op end date: Not reported

**Handler Activities Summary:**

U.S. importer of hazardous waste: No  
Mixed waste (haz. and radioactive): No  
Recycler of hazardous waste: No  
Transporter of hazardous waste: No  
Treater, storer or disposer of HW: No  
Underground injection activity: No  
On-site burner exemption: No  
Furnace exemption: No  
Used oil fuel burner: No  
Used oil processor: No  
User oil refiner: No  
Used oil fuel marketer to burner: No  
Used oil Specification marketer: No  
Used oil transfer facility: No  
Used oil transporter: No

**Historical Generators:**

Date form received by agency: 02/27/2009  
Facility name: SK HAND TOOL CORPORATION  
Classification: Large Quantity Generator

Date form received by agency: 07/25/2008  
Facility name: SK HAND TOOL CORPORATION  
Site name: SK HAND TOOL CORP  
Classification: Large Quantity Generator

Date form received by agency: 02/27/2008  
Facility name: SK HAND TOOL CORPORATION  
Site name: SK HAND TOOL CORP  
Classification: Large Quantity Generator

Date form received by agency: 02/21/2007  
Facility name: SK HAND TOOL CORPORATION  
Site name: SK HAND TOOL CORP  
Classification: Large Quantity Generator

Date form received by agency: 02/28/2006  
Facility name: SK HAND TOOL CORPORATION  
Site name: SK HAND TOOL CORP

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Classification: Large Quantity Generator

Date form received by agency: 11/28/2005  
Facility name: SK HAND TOOL CORPORATION  
Site name: SK HAND TOOL  
Classification: Large Quantity Generator

Date form received by agency: 02/19/2005  
Facility name: SK HAND TOOL CORPORATION  
Site name: SK HAND TOOL  
Classification: Large Quantity Generator

Date form received by agency: 02/16/2004  
Facility name: SK HAND TOOL CORPORATION  
Site name: SK HAND TOOL  
Classification: Large Quantity Generator

Date form received by agency: 02/25/2003  
Facility name: SK HAND TOOL CORPORATION  
Site name: SK HAND TOOL  
Classification: Large Quantity Generator

Date form received by agency: 02/13/2002  
Facility name: SK HAND TOOL CORPORATION  
Site name: SK HAND TOOL CORP  
Classification: Large Quantity Generator

Date form received by agency: 02/02/2000  
Facility name: SK HAND TOOL CORPORATION  
Classification: Large Quantity Generator

Date form received by agency: 01/29/1998  
Facility name: SK HAND TOOL CORPORATION  
Classification: Large Quantity Generator

Date form received by agency: 02/08/1996  
Facility name: SK HAND TOOL CORPORATION  
Classification: Large Quantity Generator

Date form received by agency: 01/28/1994  
Facility name: SK HAND TOOL CORPORATION  
Classification: Large Quantity Generator

Date form received by agency: 02/17/1993  
Facility name: SK HAND TOOL CORPORATION  
Site name: SK HAND TOOL CORP  
Classification: Large Quantity Generator

Date form received by agency: 02/19/1992  
Facility name: SK HAND TOOL CORPORATION  
Classification: Large Quantity Generator

Date form received by agency: 01/26/1990  
Facility name: SK HAND TOOL CORPORATION  
Classification: Large Quantity Generator

Date form received by agency: 11/19/1980



Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Facility name: SK HAND TOOL CORPORATION  
Site name: SK HAND TOOL CORP  
Classification: Not a generator, verified

**Hazardous Waste Summary:**

Waste code: D006  
Waste name: CADMIUM

Waste code: D007  
Waste name: CHROMIUM

Waste code: F006  
Waste name: WASTEWATER TREATMENT SLUDGES FROM ELECTROPLATING OPERATIONS EXCEPT FROM THE FOLLOWING PROCESSES: (1) SULFURIC ACID ANODIZING OF ALUMINUM; (2) TIN PLATING ON CARBON STEEL; (3) ZINC PLATING (SEGREGATED BASIS) ON CARBON STEEL; (4) ALUMINUM OR ZINC-ALUMINUM PLATING ON CARBON STEEL; (5) CLEANING/STRIPPING ASSOCIATED WITH TIN, ZINC AND ALUMINUM PLATING ON CARBON STEEL; AND (6) CHEMICAL ETCHING AND MILLING OF ALUMINUM.

**Facility Has Received Notices of Violations:**

Regulation violated: Not reported  
Area of violation: Generators - Records/Reporting  
Date violation determined: 08/21/2013  
Date achieved compliance: 09/17/2013  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 08/21/2013  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: Not reported  
Area of violation: Universal Waste - Small Quantity Handlers  
Date violation determined: 07/25/2008  
Date achieved compliance: 09/10/2008  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 08/14/2008  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: Not reported  
Area of violation: TSD IS-Contingency Plan and Emergency Procedures  
Date violation determined: 07/25/2008  
Date achieved compliance: 09/10/2008  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 08/14/2008

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: Not reported  
Area of violation: State Statute or Regulation  
Date violation determined: 06/13/2006  
Date achieved compliance: 12/13/2006  
Violation lead agency: State  
Enforcement action: FINAL 3008(A) COMPLIANCE ORDER  
Enforcement action date: 12/13/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: 32000  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-41(A)(5)  
Area of violation: Generators - Records/Reporting  
Date violation determined: 04/18/2006  
Date achieved compliance: 05/01/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 04/18/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-41(A)(5)  
Area of violation: Generators - Records/Reporting  
Date violation determined: 04/18/2006  
Date achieved compliance: 05/01/2006  
Violation lead agency: State  
Enforcement action: Director-Division Warning Letter  
Enforcement action date: 07/17/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-273-14(E)  
Area of violation: Universal Waste - General  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: FINAL 3008(A) COMPLIANCE ORDER  
Enforcement action date: 12/13/2006  
Enf. disposition status: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: 32000  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-279-22(C)  
Area of violation: Used Oil - Definitions  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/09/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-11  
Area of violation: Generators - General  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/09/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-11  
Area of violation: Generators - General  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 04/26/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-66-74  
Area of violation: Generators - Pre-transport  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/09/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-33  
Area of violation: Generators - Pre-transport  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 04/26/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-279-22(D)  
Area of violation: Used Oil - Definitions  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: FINAL 3008(A) COMPLIANCE ORDER  
Enforcement action date: 12/13/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: 32000  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-66-74  
Area of violation: Generators - Pre-transport  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 04/26/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-33  
Area of violation: Generators - Pre-transport  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: Director-Division Warning Letter  
Enforcement action date: 07/17/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-11  
Area of violation: Generators - General  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: Director-Division Warning Letter  
Enforcement action date: 07/17/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-11  
Area of violation: Generators - General  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: FINAL 3008(A) COMPLIANCE ORDER  
Enforcement action date: 12/13/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: 32000  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-273-13(D)(1)  
Area of violation: Universal Waste - General  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/09/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-279-22(C)  
Area of violation: Used Oil - Definitions  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 04/26/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported



Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-66-74  
Area of violation: Generators - Pre-transport  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: FINAL 3008(A) COMPLIANCE ORDER  
Enforcement action date: 12/13/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: 32000  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-273-14(E)  
Area of violation: Universal Waste - General  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/09/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-273-14(E)  
Area of violation: Universal Waste - General  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: Director-Division Warning Letter  
Enforcement action date: 07/17/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-273-13(D)(1)  
Area of violation: Universal Waste - General  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 04/26/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Paid penalty amount: Not reported

Regulation violated: SR - 3745-66-74  
Area of violation: Generators - Pre-transport  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: Director-Division Warning Letter  
Enforcement action date: 07/17/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-33  
Area of violation: Generators - Pre-transport  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/09/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-273-13(D)(1)  
Area of violation: Universal Waste - General  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: FINAL 3008(A) COMPLIANCE ORDER  
Enforcement action date: 12/13/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: 32000  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-279-22(C)  
Area of violation: Used Oil - Definitions  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: FINAL 3008(A) COMPLIANCE ORDER  
Enforcement action date: 12/13/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: 32000  
Paid penalty amount: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Regulation violated: SR - 3745-279-22(D)  
Area of violation: Used Oil - Definitions  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/09/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-273-13(D)(1)  
Area of violation: Universal Waste - General  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: Director-Division Warning Letter  
Enforcement action date: 07/17/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-273-14(E)  
Area of violation: Universal Waste - General  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 04/26/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-33  
Area of violation: Generators - Pre-transport  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: FINAL 3008(A) COMPLIANCE ORDER  
Enforcement action date: 12/13/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: 32000  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-279-22(D)

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Area of violation: Used Oil - Definitions  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 04/26/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-279-22(C)  
Area of violation: Used Oil - Definitions  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: Director-Division Warning Letter  
Enforcement action date: 07/17/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-279-22(D)  
Area of violation: Used Oil - Definitions  
Date violation determined: 11/28/2005  
Date achieved compliance: 06/13/2006  
Violation lead agency: State  
Enforcement action: Director-Division Warning Letter  
Enforcement action date: 07/17/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-270-09(A)  
Area of violation: LDR - General  
Date violation determined: 09/16/2005  
Date achieved compliance: 02/09/2006  
Violation lead agency: State  
Enforcement action: Director-Division Warning Letter  
Enforcement action date: 07/17/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-270-09(A)  
Area of violation: LDR - General

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Date violation determined: 09/16/2005  
Date achieved compliance: 02/09/2006  
Violation lead agency: State  
Enforcement action: FINAL 3008(A) COMPLIANCE ORDER  
Enforcement action date: 12/13/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: 32000  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-20(A)  
Area of violation: Generators - Manifest  
Date violation determined: 09/16/2005  
Date achieved compliance: 02/09/2006  
Violation lead agency: State  
Enforcement action: Director-Division Warning Letter  
Enforcement action date: 07/17/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SS - 3734.02(F)  
Area of violation: TSD - General  
Date violation determined: 09/16/2005  
Date achieved compliance: 02/09/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/09/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SS - 3734.02(F)  
Area of violation: TSD - General  
Date violation determined: 09/16/2005  
Date achieved compliance: 02/09/2006  
Violation lead agency: State  
Enforcement action: FINAL 3008(A) COMPLIANCE ORDER  
Enforcement action date: 12/13/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: 32000  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-270-09(A)  
Area of violation: LDR - General  
Date violation determined: 09/16/2005

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Date achieved compliance: 02/09/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/09/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-20(A)  
Area of violation: Generators - Manifest  
Date violation determined: 09/16/2005  
Date achieved compliance: 02/09/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/09/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-20(A)  
Area of violation: Generators - Manifest  
Date violation determined: 09/16/2005  
Date achieved compliance: 02/09/2006  
Violation lead agency: State  
Enforcement action: FINAL 3008(A) COMPLIANCE ORDER  
Enforcement action date: 12/13/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: 32000  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(C)  
Area of violation: Generators - Pre-transport  
Date violation determined: 09/16/2005  
Date achieved compliance: 07/25/2008  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 04/26/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(C)  
Area of violation: Generators - Pre-transport  
Date violation determined: 09/16/2005  
Date achieved compliance: 07/25/2008



Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Violation lead agency: State  
Enforcement action: Director-Division Warning Letter  
Enforcement action date: 07/17/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SS - 3734.02(F)  
Area of violation: TSD - General  
Date violation determined: 09/16/2005  
Date achieved compliance: 02/09/2006  
Violation lead agency: State  
Enforcement action: Director-Division Warning Letter  
Enforcement action date: 07/17/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-270-07(A)  
Area of violation: LDR - General  
Date violation determined: 09/16/2005  
Date achieved compliance: 02/09/2006  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/09/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-270-07(A)  
Area of violation: LDR - General  
Date violation determined: 09/16/2005  
Date achieved compliance: 02/09/2006  
Violation lead agency: State  
Enforcement action: Director-Division Warning Letter  
Enforcement action date: 07/17/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-270-07(A)  
Area of violation: LDR - General  
Date violation determined: 09/16/2005  
Date achieved compliance: 02/09/2006  
Violation lead agency: State

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

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Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Enforcement action: FINAL 3008(A) COMPLIANCE ORDER  
Enforcement action date: 12/13/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: 32000  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(C)  
Area of violation: Generators - Pre-transport  
Date violation determined: 09/16/2005  
Date achieved compliance: 07/25/2008  
Violation lead agency: State  
Enforcement action: FINAL 3008(A) COMPLIANCE ORDER  
Enforcement action date: 12/13/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: 32000  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(C)  
Area of violation: Generators - Pre-transport  
Date violation determined: 09/16/2005  
Date achieved compliance: 07/25/2008  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/09/2006  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(C)  
Area of violation: Generators - Pre-transport  
Date violation determined: 10/02/2000  
Date achieved compliance: 12/19/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 10/02/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(E)  
Area of violation: Generators - Pre-transport  
Date violation determined: 07/26/2000  
Date achieved compliance: 10/02/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Enforcement action date: 08/01/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-34(A)(3)  
Area of violation: Generators - Pre-transport  
Date violation determined: 07/26/2000  
Date achieved compliance: 09/06/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 08/01/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(D)(4)  
Area of violation: Generators - Pre-transport  
Date violation determined: 07/26/2000  
Date achieved compliance: 10/02/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 08/01/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(E)  
Area of violation: Generators - Pre-transport  
Date violation determined: 07/26/2000  
Date achieved compliance: 10/02/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 09/06/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(D)(4)  
Area of violation: Generators - Pre-transport  
Date violation determined: 07/26/2000  
Date achieved compliance: 10/02/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 09/06/2000

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-52(D)  
Area of violation: Generators - Pre-transport  
Date violation determined: 07/26/2000  
Date achieved compliance: 09/06/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 08/01/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-279-22(C)  
Area of violation: Used Oil - Definitions  
Date violation determined: 07/26/2000  
Date achieved compliance: 09/06/2000  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 08/01/2000  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-33  
Area of violation: Generators - Pre-transport  
Date violation determined: 02/07/1994  
Date achieved compliance: 08/01/1994  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/18/1994  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-33(B)  
Area of violation: Generators - Pre-transport  
Date violation determined: 02/07/1994  
Date achieved compliance: 08/01/1994  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/18/1994  
Enf. disposition status: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(B)  
Area of violation: Generators - Pre-transport  
Date violation determined: 02/07/1994  
Date achieved compliance: 08/01/1994  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/18/1994  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-20  
Area of violation: Generators - Manifest  
Date violation determined: 02/07/1994  
Date achieved compliance: 08/01/1994  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/18/1994  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-66-74(B)  
Area of violation: Generators - Pre-transport  
Date violation determined: 02/07/1994  
Date achieved compliance: 08/16/1994  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 08/01/1994  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-16(D)(E)  
Area of violation: Generators - Pre-transport  
Date violation determined: 02/07/1994  
Date achieved compliance: 08/01/1994  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/18/1994  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-66-74(B)  
Area of violation: Generators - Pre-transport  
Date violation determined: 02/07/1994  
Date achieved compliance: 08/16/1994  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/18/1994  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: Not reported  
Area of violation: Generators - General  
Date violation determined: 03/08/1988  
Date achieved compliance: 03/30/1988  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 03/11/1988  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: Not reported  
Area of violation: Generators - General  
Date violation determined: 05/08/1987  
Date achieved compliance: 09/11/1987  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 05/20/1987  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Evaluation Action Summary:  
Evaluation date: 08/21/2013  
Evaluation: NON-FINANCIAL RECORD REVIEW  
Area of violation: Generators - Records/Reporting  
Date achieved compliance: 09/17/2013  
Evaluation lead agency: State  
  
Evaluation date: 05/05/2010  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Not reported



Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Date achieved compliance: Not reported  
Evaluation lead agency: State

Evaluation date: 07/25/2008  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: TSD IS-Contingency Plan and Emergency Procedures  
Date achieved compliance: 09/10/2008  
Evaluation lead agency: State

Evaluation date: 07/25/2008  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Universal Waste - Small Quantity Handlers  
Date achieved compliance: 09/10/2008  
Evaluation lead agency: State

Evaluation date: 12/13/2006  
Evaluation: NOT A SIGNIFICANT NON-COMPLIER  
Area of violation: Not reported  
Date achieved compliance: Not reported  
Evaluation lead agency: State

Evaluation date: 06/13/2006  
Evaluation: NON-FINANCIAL RECORD REVIEW  
Area of violation: State Statute or Regulation  
Date achieved compliance: 12/13/2006  
Evaluation lead agency: State

Evaluation date: 05/24/2006  
Evaluation: SIGNIFICANT NON-COMPLIER  
Area of violation: Not reported  
Date achieved compliance: Not reported  
Evaluation lead agency: State

Evaluation date: 04/26/2006  
Evaluation: FOLLOW-UP INSPECTION  
Area of violation: Generators - Pre-transport  
Date achieved compliance: 06/13/2006  
Evaluation lead agency: State

Evaluation date: 04/26/2006  
Evaluation: FOLLOW-UP INSPECTION  
Area of violation: Generators - Pre-transport  
Date achieved compliance: 07/25/2008  
Evaluation lead agency: State

Evaluation date: 04/26/2006  
Evaluation: FOLLOW-UP INSPECTION  
Area of violation: Used Oil - Definitions  
Date achieved compliance: 06/13/2006  
Evaluation lead agency: State

Evaluation date: 04/26/2006  
Evaluation: FOLLOW-UP INSPECTION  
Area of violation: Generators - General  
Date achieved compliance: 06/13/2006  
Evaluation lead agency: State

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Evaluation date: 04/26/2006  
Evaluation: FOLLOW-UP INSPECTION  
Area of violation: Universal Waste - General  
Date achieved compliance: 06/13/2006  
Evaluation lead agency: State

Evaluation date: 04/18/2006  
Evaluation: NON-FINANCIAL RECORD REVIEW  
Area of violation: Generators - Records/Reporting  
Date achieved compliance: 05/01/2006  
Evaluation lead agency: State

Evaluation date: 11/28/2005  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Used Oil - Definitions  
Date achieved compliance: 06/13/2006  
Evaluation lead agency: State

Evaluation date: 11/28/2005  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Universal Waste - General  
Date achieved compliance: 06/13/2006  
Evaluation lead agency: State

Evaluation date: 11/28/2005  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: TSD - General  
Date achieved compliance: 02/09/2006  
Evaluation lead agency: State

Evaluation date: 11/28/2005  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Generators - Manifest  
Date achieved compliance: 02/09/2006  
Evaluation lead agency: State

Evaluation date: 11/28/2005  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: LDR - General  
Date achieved compliance: 02/09/2006  
Evaluation lead agency: State

Evaluation date: 11/28/2005  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Generators - Pre-transport  
Date achieved compliance: 07/25/2008  
Evaluation lead agency: State

Evaluation date: 11/28/2005  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Generators - General  
Date achieved compliance: 06/13/2006  
Evaluation lead agency: State

Evaluation date: 11/28/2005  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Generators - Pre-transport

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Date achieved compliance: 06/13/2006  
Evaluation lead agency: State

Evaluation date: 09/16/2005  
Evaluation: FOCUSED COMPLIANCE INSPECTION  
Area of violation: TSD - General  
Date achieved compliance: 02/09/2006  
Evaluation lead agency: State

Evaluation date: 09/16/2005  
Evaluation: FOCUSED COMPLIANCE INSPECTION  
Area of violation: Generators - Manifest  
Date achieved compliance: 02/09/2006  
Evaluation lead agency: State

Evaluation date: 09/16/2005  
Evaluation: FOCUSED COMPLIANCE INSPECTION  
Area of violation: LDR - General  
Date achieved compliance: 02/09/2006  
Evaluation lead agency: State

Evaluation date: 10/02/2000  
Evaluation: FOCUSED COMPLIANCE INSPECTION  
Area of violation: Generators - Pre-transport  
Date achieved compliance: 12/19/2000  
Evaluation lead agency: State

Evaluation date: 07/26/2000  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Generators - Pre-transport  
Date achieved compliance: 09/06/2000  
Evaluation lead agency: State

Evaluation date: 07/26/2000  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Used Oil - Definitions  
Date achieved compliance: 09/06/2000  
Evaluation lead agency: State

Evaluation date: 07/26/2000  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Generators - Pre-transport  
Date achieved compliance: 10/02/2000  
Evaluation lead agency: State

Evaluation date: 02/07/1994  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Generators - Pre-transport  
Date achieved compliance: 08/16/1994  
Evaluation lead agency: State

Evaluation date: 02/07/1994  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Generators - Pre-transport  
Date achieved compliance: 08/01/1994  
Evaluation lead agency: State

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Evaluation date: 02/07/1994  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Generators - Manifest  
Date achieved compliance: 08/01/1994  
Evaluation lead agency: State

Evaluation date: 03/08/1988  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Generators - General  
Date achieved compliance: 03/30/1988  
Evaluation lead agency: State

Evaluation date: 05/08/1987  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Generators - General  
Date achieved compliance: 09/11/1987  
Evaluation lead agency: State

**FINDS:**

Registry ID: 110000383558

**Environmental Interest/Information System**

AFS (Aerometric Information Retrieval System (AIRS) Facility Subsystem) replaces the former Compliance Data System (CDS), the National Emission Data System (NEDS), and the Storage and Retrieval of Aerometric Data (SAROAD). AIRS is the national repository for information concerning airborne pollution in the United States. AFS is used to track emissions and compliance data from industrial plants. AFS data are utilized by states to prepare State Implementation Plans to comply with regulatory programs and by EPA as an input for the estimation of total national emissions. AFS is undergoing a major redesign to support facility operating permits required under Title V of the Clean Air Act.

NCDB (National Compliance Data Base) supports implementation of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and the Toxic Substances Control Act (TSCA). The system tracks inspections in regions and states with cooperative agreements, enforcement actions, and settlements.

US EPA TRIS (Toxics Release Inventory System) contains information from facilities on the amounts of over 300 listed toxic chemicals that these facilities release directly to air, water, land, or that are transported off-site.

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

CERCLIS (Comprehensive Environmental Response, Compensation, and Liability Information System) is the Superfund database that is used to support management in all phases of the Superfund program. The system contains information on all aspects of hazardous waste sites, including an inventory of sites, planned and actual site activities,

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

and financial information.

**HAZARDOUS WASTE BIENNIAL REPORTER**

The OH-CORE (Ohio - Core) database contains information commonly shared among the Ohio EPA environmental programs. The information is facility-based, general in nature, and used to support specific programmatic systems while simultaneously maintaining an inventory of common facility-related data. Specific programmatic details are maintained in programmatic databases.

ICIS (Integrated Compliance Information System) is the Integrated Compliance Information System and provides a database that, when complete, will contain integrated Enforcement and Compliance information across most of EPA's programs. The vision for ICIS is to replace EPA's independent databases that contain Enforcement data with a single repository for that information. Currently, ICIS contains all Federal Administrative and Judicial enforcement actions. This information is maintained in ICIS by EPA in the Regional offices and it Headquarters. A future release of ICIS will replace the Permit Compliance System (PCS) which supports the NPDES and will integrate that information with Federal actions already in the system. ICIS also has the capability to track other activities occurring in the Region that support Compliance and Enforcement programs. These include; Incident Tracking, Compliance Assistance, and Compliance Monitoring.

**PA MANIFEST:**

Year: 2006  
Manifest Number: 000396463JJK  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 10/31/2006  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: Not reported  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: 245 PORTERSVILLE ROAD  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: 419-784-1122  
Page Number: 1  
Line Number: 2  
Waste Number: D002  
Container Number: 4  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 220  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported  
  
Year: 2006  
Manifest Number: PAH052796

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 06/15/2006  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: Not reported  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: 245 PORTERSVILLE ROAD  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: 419-784-1122  
Page Number: 1  
Line Number: 2  
Waste Number: D002  
Container Number: 4  
Container Type: Fiberboard or plastic drums, barrels, kegs  
Waste Quantity: 220  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2006  
Manifest Number: 000396463JJK  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 10/31/2006  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: Not reported  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: 245 PORTERSVILLE ROAD  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: 419-784-1122  
Page Number: 1  
Line Number: 2  
Waste Number: D007  
Container Number: 4  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 220  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2006  
Manifest Number: PAH052822  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 03/15/2006



Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: Not reported  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: 245 PORTERSVILLE ROAD  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: 419-784-1122  
Page Number: 1  
Line Number: 2  
Waste Number: D002  
Container Number: 3  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 165  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2006  
Manifest Number: PAH052793  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 05/16/2006  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: Not reported  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: 245 PORTERSVILLE ROAD  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: 419-784-1122  
Page Number: 1  
Line Number: 1  
Waste Number: D007  
Container Number: 7  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 385  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2006  
Manifest Number: 000396463JJJ  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 10/31/2006  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Contact Phone: Not reported  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: 245 PORTERSVILLE ROAD  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: 419-784-1122  
Page Number: 1  
Line Number: 1  
Waste Number: D007  
Container Number: 14  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 770  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2006  
Manifest Number: PAH052822  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 03/15/2006  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: Not reported  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: 245 PORTERSVILLE ROAD  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: 419-784-1122  
Page Number: 1  
Line Number: 2  
Waste Number: D007  
Container Number: 3  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 165  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2006  
Manifest Number: PAH052796  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 06/15/2006  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: Not reported  
TSD Epa Id: PAD087561015  
TSD Date: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

TSD Facility Name: INMETCO  
TSD Facility Address: 245 PORTERSVILLE ROAD  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: 419-784-1122  
Page Number: 1  
Line Number: 1  
Waste Number: D007  
Container Number: 5  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 275  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2006  
Manifest Number: PAH052822  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 03/15/2006  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: Not reported  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: 245 PORTERSVILLE ROAD  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: 419-784-1122  
Page Number: 1  
Line Number: 1  
Waste Number: D007  
Container Number: 6  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 330  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2006  
Manifest Number: PAH052796  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 06/15/2006  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: Not reported  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: 245 PORTERSVILLE ROAD  
TSD Facility City: ELLWOOD CITY

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

TSD Facility State: PA  
Facility Telephone: 419-784-1122  
Page Number: 1  
Line Number: 2  
Waste Number: D007  
Container Number: 4  
Container Type: Fiberboard or plastic drums, barrels, kegs  
Waste Quantity: 220  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2006  
Manifest Number: PAH052820  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 02/15/2006  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: Not reported  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: 245 PORTERSVILLE ROAD  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: 419-784-1122  
Page Number: 1  
Line Number: 1  
Waste Number: D007  
Container Number: 6  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 330  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2005  
Manifest Number: PAH052807  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 04/15/2005  
Mailing Address: 135 HICKORY ST  
Mailing City,St,Zip: DEFIANCE, OH 43512  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: 04/22/2005  
TSD Facility Name: INMETCO INC  
TSD Facility Address: ONE INMETCO DR  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Line Number: 1  
Waste Number: D007  
Container Number: 7  
Container Type: Fiberboard or plastic drums, barrels, kegs  
Waste Quantity: 385  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: OHD981000557  
Date TSP Sig: 04/15/2005

Year: 2005  
Manifest Number: PAH052805  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 01/31/2005  
Mailing Address: 135 HICKORY ST  
Mailing City,St,Zip: DEFIANCE, OH 43512  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: 02/07/2005  
TSD Facility Name: INMETCO INC  
TSD Facility Address: ONE INMETCO DR  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported

Page Number: 1  
Line Number: 1  
Waste Number: D007  
Container Number: 4  
Container Type: Fiberboard or plastic drums, barrels, kegs  
Waste Quantity: 220  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: OHD981000557  
Date TSP Sig: 01/31/2005

Year: 2005  
Manifest Number: PAH052802  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 01/14/2005  
Mailing Address: 135 HICKORY ST  
Mailing City,St,Zip: DEFIANCE, OH 43512  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: 01/20/2005  
TSD Facility Name: INMETCO INC  
TSD Facility Address: ONE INMETCO DR  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 2  
Waste Number: D007  
Container Number: 12

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Container Type: Fiberboard or plastic drums, barrels, kegs  
Waste Quantity: 660  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: OHD981000557  
Date TSP Sig: 01/14/2005

Year: 2005  
Manifest Number: PAH052802  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 01/14/2005  
Mailing Address: 135 HICKORY ST  
Mailing City,St,Zip: DEFIANCE, OH 43512  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: 01/20/2005  
TSD Facility Name: INMETCO INC  
TSD Facility Address: ONE INMETCO DR  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 1  
Waste Number: D002  
Container Number: 4  
Container Type: Fiberboard or plastic drums, barrels, kegs  
Waste Quantity: 210  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: OHD981000557  
Date TSP Sig: 01/14/2005

Year: 2005  
Manifest Number: PAH052806  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 02/15/2005  
Mailing Address: 135 HICKORY ST  
Mailing City,St,Zip: DEFIANCE, OH 43512  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: 02/25/2005  
TSD Facility Name: INMETCO INC  
TSD Facility Address: ONE INMETCO DR  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 1  
Waste Number: D007  
Container Number: 6  
Container Type: Fiberboard or plastic drums, barrels, kegs  
Waste Quantity: 330  
Unit: Gallons (liquids only)



Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Handling Code: Not reported  
TSP EPA Id: OHD981000557  
Date TSP Sig: 02/15/2005  
  
Year: 2005  
Manifest Number: PAH052805  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 01/31/2005  
Mailing Address: 135 HICKORY ST  
Mailing City,St,Zip: DEFIANCE, OH 43512  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: 02/07/2005  
TSD Facility Name: INMETCO INC  
TSD Facility Address: ONE INMETCO DR  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 1  
Waste Number: D002  
Container Number: 4  
Container Type: Fiberboard or plastic drums, barrels, kegs  
Waste Quantity: 220  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: OHD981000557  
Date TSP Sig: 01/31/2005

**NY MANIFEST:**

EPA ID: OHD045247350  
Country: USA  
Mailing Name: S K HAND TOOL CORPPORATION  
Mailing Contact: BILL ZIRKLE  
Mailing Address: 135 HICKORY STREET  
Mailing Address 2: Not reported  
Mailing City: DEFIANCE  
Mailing State: OH  
Mailing Zip: 43512  
Mailing Zip4: Not reported  
Mailing Country: USA  
Mailing Phone: 419-784-1122

Document ID: NYB2389248  
Manifest Status: Completed copy  
Trans1 State ID: 2295AP  
Trans2 State ID: Not reported  
Generator Ship Date: 910501  
Trans1 Recv Date: 910501  
Trans2 Recv Date: Not reported  
TSD Site Recv Date: 910502  
Part A Recv Date: 910513  
Part B Recv Date: 910514  
Generator EPA ID: OHD045247350

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1000239478**

Trans1 EPA ID: OKD981605363  
Trans2 EPA ID: Not reported  
TSDF ID: NYD043815703  
Waste Code: D002 - NON-LISTED CORROSIVE WASTES  
Quantity: 00385  
Units: G - Gallons (liquids only)\* (8.3 pounds)  
Number of Containers: 007  
Container Type: DF - Fiberboard or plastic drums (glass)  
Handling Method: T Chemical, physical, or biological treatment.  
Specific Gravity: 100  
Year: 91

Document ID: NYB2447028  
Manifest Status: Completed after the designated time period for a TSDF to get a copy to the DEC  
Trans1 State ID: 81116UNY  
Trans2 State ID: Not reported  
Generator Ship Date: 910919  
Trans1 Recv Date: 910919  
Trans2 Recv Date: Not reported  
TSD Site Recv Date: 910920  
Part A Recv Date: Not reported  
Part B Recv Date: 920331  
Generator EPA ID: OHD045247350  
Trans1 EPA ID: NYD982792814  
Trans2 EPA ID: Not reported  
TSDF ID: NYD043815703  
Waste Code: D002 - NON-LISTED CORROSIVE WASTES  
Quantity: 00825  
Units: G - Gallons (liquids only)\* (8.3 pounds)  
Number of Containers: 015  
Container Type: DM - Metal drums, barrels  
Handling Method: T Chemical, physical, or biological treatment.  
Specific Gravity: 100  
Year: 91

CRO:  
Facility Id: 2403  
SIC Code: 332212  
30/45 Date: 08/10/2010  
90 Day Date: Not reported  
Holder Of 1st Mortgage/Fiduciary Date: Not reported  
Most Recent Inspection Date: Not reported  
Current Status: OHD04547350

**A3  
Target  
Property**

**SK HAND TOOLS CORP.  
135 HICKORY  
DEFIANCE, OH 43512**

**OH LUST U004203660  
OH UST N/A**

**Site 3 of 10 in cluster A**

**Actual:  
713 ft.**

LUST:  
Release Number: 20000005-N00001  
Release Date: 07/13/1992  
**Facility Status: Inactive**  
LTF Status: 1 SUS/CON from regulated UST  
**FR Status: NFA: No Further Action**

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOLS CORP. (Continued)**

**U004203660**

Priority: 2  
Review Date: 08/04/2005  
Class: Viable Responsible Party has been identified

UST:

Facility Id: 20000005  
Facility Type: Unknown  
Owner Name: Not reported  
Owner Address: Not reported  
Owner City/State/Zip: Not reported  
  
Tank Number: T00001  
Status: REM - Removed  
UST Capacity: 15000  
Tank Content: Kerosene  
Installation Date: Not reported  
Construction: BM - Bare Metal  
Date Last Used: 01/01/1992  
Date TCL Closed: Not reported  
Date Removed: 01/01/1992  
CAS Number: 8008-20-6  
Abandoned Approved: Not reported  
Regulated: YES  
Sensitive Area: NO  
Date Of Sensitivity: Not reported  
UST Configurations: Not reported  
Construction Comments: Steel  
Corrosion Protections: Not reported  
Corrosion Protection Comments: Not reported  
Primary Release Detection: AMO - Alternative Method (Other, explain)  
Secondary Release Detection: Not reported  
Release Detection Comments: RDTank: / RDLine:  
Piping Configuration: Not reported  
Piping Configuration Comments: Not reported  
Piping Styles: S - Suction  
Piping Constructions: BM - Bare Metal  
Piping Construction Comments: Bare Steel  
Piping Corrosion Protections: OTH - Other (explain)  
Piping Corrosion Protection Comments: Not reported  
Piping Release Detections: OTH - Other(explain)  
Piping Release Detection Comments: Not reported  
Spill Prevention Manholes: NP - None Present  
Spill Prevention Manhole Comments: No  
OverFill Prevention: Not reported  
OverFill Prevention Comment: OverFill Spill: No  
Comments: Not reported

Tank Number: T00002  
Status: REM - Removed  
UST Capacity: 5000  
Tank Content: Diesel  
Installation Date: Not reported  
Construction: BM - Bare Metal  
Date Last Used: 01/01/1992  
Date TCL Closed: Not reported  
Date Removed: 01/01/1992

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOLS CORP. (Continued)**

**U004203660**

CAS Number: 68334-30-5  
Abandoned Approved: Not reported  
Regulated: YES  
Sensitive Area: NO  
Date Of Sensitivity: Not reported  
UST Configurations: Not reported  
Construction Comments: Steel  
Corrosion Protections: Not reported  
Corrosion Protection Comments: Not reported  
Primary Release Detection: AMO - Alternative Method (Other, explain)  
Secondary Release Detection: Not reported  
Release Detection Comments: RDTank: / RDLine:  
Piping Configuration: Not reported  
Piping Configuration Comments: Not reported  
Piping Styles: S - Suction  
Piping Constructions: BM - Bare Metal  
Piping Construction Comments: Bare Steel  
Piping Corrosion Protections: OTH - Other (explain)  
Piping Corrosion Protection Comments: Not reported  
Piping Release Detections: OTH - Other(explain)  
Piping Release Detection Comments: Not reported  
Spill Prevention Manholes: NP - None Present  
Spill Prevention Manhole Comments: No  
OverFill Prevention: Not reported  
OverFill Prevention Comment: OverFill Spill: No  
Comments: Not reported

**A4**  
**Target**  
**Property**

**SK HAND TOOL CORP**  
**135 HICKORY STREET**  
**DEFIANCE, OH 43512**

**PA MANIFEST** **S109247481**  
**N/A**

**Site 4 of 10 in cluster A**

**Actual:**  
**713 ft.**

PA MANIFEST:  
Year: 2008  
Manifest Number: 000399093JJK  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 01/15/2008  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO INTERNATIONAL METALS RECLAMATION COMPANY INC  
TSD Facility Address: ONE INMETCO DRIVE  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 1  
Waste Number: D007  
Container Number: 8  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 440  
Unit: Gallons (liquids only)  
Handling Code: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**S109247481**

TSP EPA Id:	Not reported
Date TSP Sig:	Not reported
Year:	2008
Manifest Number:	003992183JJK
Manifest Type:	T
Generator EPA Id:	OHD045247350
Generator Date:	07/31/2008
Mailing Address:	Not reported
Mailing City, St, Zip:	Not reported
Contact Name:	Not reported
Contact Phone:	419-784-1122
TSD Epa Id:	PAD087561015
TSD Date:	Not reported
TSD Facility Name:	INMETCO INTERNATIONAL METALS RECLAMATION COMPANY INC
TSD Facility Address:	ONE INMETCO DRIVE
TSD Facility City:	ELLWOOD CITY
TSD Facility State:	PA
Facility Telephone:	Not reported
Page Number:	1
Line Number:	1
Waste Number:	D007
Container Number:	3
Container Type:	Metal drums, barrels, kegs
Waste Quantity:	165
Unit:	Gallons (liquids only)
Handling Code:	Not reported
TSP EPA Id:	Not reported
Date TSP Sig:	Not reported
Year:	2008
Manifest Number:	000399263JJK
Manifest Type:	T
Generator EPA Id:	OHD045247350
Generator Date:	03/14/2008
Mailing Address:	Not reported
Mailing City, St, Zip:	Not reported
Contact Name:	Not reported
Contact Phone:	419-784-1122
TSD Epa Id:	PAD087561015
TSD Date:	Not reported
TSD Facility Name:	INMETCO INTERNATIONAL METALS RECLAMATION COMPANY INC
TSD Facility Address:	ONE INMETCO DRIVE
TSD Facility City:	ELLWOOD CITY
TSD Facility State:	PA
Facility Telephone:	Not reported
Page Number:	1
Line Number:	1
Waste Number:	D007
Container Number:	8
Container Type:	Metal drums, barrels, kegs
Waste Quantity:	440
Unit:	Gallons (liquids only)
Handling Code:	Not reported
TSP EPA Id:	Not reported
Date TSP Sig:	Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**S109247481**

Year: 2008  
Manifest Number: 000399263JJJ  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 03/14/2008  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO INTERNATIONAL METALS RECLAMATION COMPANY INC  
TSD Facility Address: ONE INMETCO DRIVE  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 2  
Waste Number: D002  
Container Number: 4  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 220  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2008  
Manifest Number: 000399263JJJ  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 03/14/2008  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO INTERNATIONAL METALS RECLAMATION COMPANY INC  
TSD Facility Address: ONE INMETCO DRIVE  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 2  
Waste Number: D007  
Container Number: 4  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 220  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2008  
Manifest Number: 003992183JJJ  
Manifest Type: T



Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**S109247481**

Generator EPA Id: OHD045247350  
Generator Date: 07/31/2008  
Mailing Address: Not reported  
Mailing City, St, Zip: Not reported  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO INTERNATIONAL METALS RECLAMATION COMPANY INC  
TSD Facility Address: ONE INMETCO DRIVE  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 1  
Waste Number: D002  
Container Number: 3  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 165  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2008  
Manifest Number: 003989503JJK  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 12/01/2008  
Mailing Address: Not reported  
Mailing City, St, Zip: Not reported  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO INTERNATIONAL METALS RECLAMATION COMPANY INC  
TSD Facility Address: ONE INMETCO DRIVE  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 1  
Waste Number: D007  
Container Number: 6  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 330  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2008  
Manifest Number: 003992183JJK  
Manifest Type: T  
Generator EPA Id: OHD045247350  
Generator Date: 07/31/2008  
Mailing Address: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**S109247481**

Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO INTERNATIONAL METALS RECLAMATION COMPANY INC  
TSD Facility Address: ONE INMETCO DRIVE  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 2  
Waste Number: D007  
Container Number: 7  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 385  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2007  
Manifest Number: 000397711JJK  
Manifest Type: Not reported  
Generator EPA Id: OHD045247350  
Generator Date: 11/01/2007  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: ONE INMETCO DRIVE  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 2  
Waste Number: D007  
Container Number: 7  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 385  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2007  
Manifest Number: 000397711JJK  
Manifest Type: Not reported  
Generator EPA Id: OHD045247350  
Generator Date: 11/01/2007  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: 419-784-1122

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**S109247481**

TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: ONE INMETCO DRIVE  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 1  
Waste Number: D007  
Container Number: 3  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 165  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2007  
Manifest Number: 000394748JJK  
Manifest Type: Not reported  
Generator EPA Id: OHD045247350  
Generator Date: 05/16/2007  
Mailing Address: Not reported  
Mailing City, St, Zip: Not reported  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: ONE INMETCO DRIVE  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 1  
Waste Number: D002  
Container Number: 3  
Container Type: Fiberboard or plastic drums, barrels, kegs  
Waste Quantity: 165  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2007  
Manifest Number: 000393338JJK  
Manifest Type: Not reported  
Generator EPA Id: OHD045247350  
Generator Date: 01/31/2007  
Mailing Address: Not reported  
Mailing City, St, Zip: Not reported  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**S109247481**

TSD Facility Address: ONE INMETCO DRIVE  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 2  
Waste Number: D007  
Container Number: 15  
Container Type: Fiberboard or plastic drums, barrels, kegs  
Waste Quantity: 825  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2007  
Manifest Number: 000393338JJK  
Manifest Type: Not reported  
Generator EPA Id: OHD045247350  
Generator Date: 01/31/2007  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: ONE INMETCO DRIVE  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 1  
Waste Number: D007  
Container Number: 3  
Container Type: Fiberboard or plastic drums, barrels, kegs  
Waste Quantity: 165  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2007  
Manifest Number: 000397711JJK  
Manifest Type: Not reported  
Generator EPA Id: OHD045247350  
Generator Date: 11/01/2007  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: ONE INMETCO DRIVE  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**S109247481**

Facility Telephone: Not reported  
Page Number: 1  
Line Number: 1  
Waste Number: D002  
Container Number: 3  
Container Type: Metal drums, barrels, kegs  
Waste Quantity: 165  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2007  
Manifest Number: 000394748JJK  
Manifest Type: Not reported  
Generator EPA Id: OHD045247350  
Generator Date: 05/16/2007  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: ONE INMETCO DRIVE  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 1  
Waste Number: D007  
Container Number: 3  
Container Type: Fiberboard or plastic drums, barrels, kegs  
Waste Quantity: 165  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2007  
Manifest Number: 000394748JJK  
Manifest Type: Not reported  
Generator EPA Id: OHD045247350  
Generator Date: 05/16/2007  
Mailing Address: Not reported  
Mailing City,St,Zip: Not reported  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: ONE INMETCO DRIVE  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 2

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**S109247481**

Waste Number: D007  
Container Number: 8  
Container Type: Fiberboard or plastic drums, barrels, kegs  
Waste Quantity: 440  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

Year: 2007  
Manifest Number: 000393338JJK  
Manifest Type: Not reported  
Generator EPA Id: OHD045247350  
Generator Date: 01/31/2007  
Mailing Address: Not reported  
Mailing City, St, Zip: Not reported  
Contact Name: Not reported  
Contact Phone: 419-784-1122  
TSD Epa Id: PAD087561015  
TSD Date: Not reported  
TSD Facility Name: INMETCO  
TSD Facility Address: ONE INMETCO DRIVE  
TSD Facility City: ELLWOOD CITY  
TSD Facility State: PA  
Facility Telephone: Not reported  
Page Number: 1  
Line Number: 1  
Waste Number: D002  
Container Number: 3  
Container Type: Fiberboard or plastic drums, barrels, kegs  
Waste Quantity: 165  
Unit: Gallons (liquids only)  
Handling Code: Not reported  
TSP EPA Id: Not reported  
Date TSP Sig: Not reported

**A5  
Target  
Property**

**SK HAND TOOLS CORP.  
135 HICKORY  
DEFIANCE, OH 43512**

**OH ARCHIVE UST  
OH NPDES**

**U004101108  
N/A**

**Site 5 of 10 in cluster A**

**Actual:  
713 ft.**

ARCHIVE UST:  
Facility Number: 20000005

**Tanks:**

Tank ID: T00001  
**Tank Status: Removed**  
Tank Type: Steel  
Capacity: 15000  
Content: Kerosene  
CAS #: 8008-20-6  
Regulated: Yes  
Overfill Device Installed: No  
Spill Device Installed: No  
Installation Date: Not reported  
Date Removed: 1/1/1992  
Date Last Used: 1/1/1992

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOLS CORP. (Continued)**

**U004101108**

Date Abandoned/Closed: Not reported  
Corrosion Protection Tank: Not reported  
Release Detection on Tank: Not reported  
Corrosion Protection Piping: Not reported  
Piping Material: Bare Steel  
Piping Type: Suction: no valve at tank  
Release Detection on Piping: Not reported

Tank ID: T00002  
**Tank Status: Removed**  
Tank Type: Steel  
Capacity: 5000  
Content: Diesel  
CAS #: 68334-30-5  
Regulated: Yes  
Overfill Device Installed: No  
Spill Device Installed: No  
Installation Date: Not reported  
Date Removed: 1/1/1992  
Date Last Used: 1/1/1992  
Date Abandoned/Closed: Not reported  
Corrosion Protection Tank: Not reported  
Release Detection on Tank: Not reported  
Corrosion Protection Piping: Not reported  
Piping Material: Bare Steel  
Piping Type: Suction: no valve at tank  
Release Detection on Piping: Not reported

**OH NPDES:**

Issue Date: 03/26/2009  
Township: Not reported  
Facility Npdes Permit: 2GRN00248\*DG  
Applicant Name: SK HANDTOOL CORPORATION  
Applicant Address: 135 HICKORY ST

**A6  
Target  
Property**

**SK HAND TOOL SITE  
135 HICKORY STREET  
DEFIANCE, OH 43512**

**CERCLIS 1014915029  
OHN000510633**

**Site 6 of 10 in cluster A**

**Actual:  
713 ft.**

**CERCLIS:**  
Site ID: 0510633  
EPA ID: OHN000510633  
Facility County: DEFIANCE  
Short Name: SK HAND TOOL SITE  
Congressional District: 05  
IFMS ID: C574  
SMSA Number: Not reported  
USGC Hydro Unit: Not reported  
Federal Facility: Not a Federal Facility  
DMNSN Number: 0.00000  
Site Orphan Flag: Not reported  
RCRA ID: Not reported  
USGS Quadrangle: Not reported  
Site Init By Prog: T



Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL SITE (Continued)**

**1014915029**

NFRAP Flag: Not reported  
Parent ID: Not reported  
RST Code: Not reported  
EPA Region: 05  
Classification: Not reported  
Site Settings Code: Not reported  
NPL Status: Not on the NPL  
DMNSN Unit Code: Not reported  
RBRAC Code: Not reported  
RResp Fed Agency Code: Not reported  
Non NPL Status: Removal Only Site (No Site Assessment Work Needed)  
Non NPL Status Date: 09/06/11  
Site Fips Code: 39039  
CC Concurrence Date: / /  
CC Concurrence FY: Not reported  
Alias EPA ID: Not reported  
Site FUDS Flag: Not reported

**CERCLIS Site Contact Name(s):**

Contact ID: 5272313.00000  
Contact Name: BRIAN KELLY  
Contact Tel: (734) 692-7684  
Contact Title: On-Scene Coordinator (OSC)  
Contact Email: Not reported

Contact ID: 5270366.00000  
Contact Name: PARTAP LALL  
Contact Tel: (734) 692-7685  
Contact Title: On-Scene Coordinator (OSC)  
Contact Email: Not reported

**CERCLIS Site Alias Name(s):**

Alias ID: 101  
Alias Name: S & K HAND TOOLS SITE  
Alias Address: Not reported  
Not reported

Alias ID: 102  
Alias Name: S & K HAND TOOLS SITE  
Alias Address: 135 HICKORY STREET  
DEFIANCE, OH 435122460

Alias ID: 101  
Alias Comments: Not reported

Site Description: The S&K Handtoo site manufactured tools such as wrenches and rachets, generating electroplating sludge (F006, Doo7), acids (D002), stripping wastes (D002, Doo7), and occasionally chromic acid solution (D002, D007) and was a large quantity generator of hazardous waste. In April 2011, the facility failed to comply with the Ohio EPA CRO program and declared bankruptcy.

**CERCLIS Assessment History:**

Action Code: 001  
Action: REMOVAL  
Date Started: 05/29/12  
Date Completed: 06/28/12  
Priority Level: Stabilized  
Operable Unit: SITEWIDE  
Primary Responsibility: EPA Fund-Financed

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL SITE (Continued)**

**1014915029**

Planning Status: Approved  
Urgency Indicator: Time Critical  
Action Anomaly: Not reported

For detailed financial records, contact EDR for a Site Report.:

[Click this hyperlink](#) while viewing on your computer to access  
39 additional US CERCLIS Financial: record(s) in the EDR Site Report.

**A7**  
**Target**  
**Property**

**SK HAND TOOL CORP**  
**135 HICKORY ST**  
**DEFIANCE, OH**

**OH RGA LUST** **S114788491**  
**N/A**

**Site 7 of 10 in cluster A**

**Actual:**  
**713 ft.**

RGA LUST:

1999	SK HAND TOOL CORP	135 HICKORY ST
1998	SK HAND TOOL CORP	135 HICKORY ST
1997	SK HAND TOOL CORP	135 HICKORY ST
1996	SK HAND TOOL CORP	135 HICKORY ST
1995	SK HAND TOOL CORP	135 HICKORY ST
1994	SK HAND TOOL CORP	135 HICKORY ST

**A8**  
**Target**  
**Property**

**SK TOOLS**  
**135 HICKORY ST**  
**DEFIANCE, OH 43512**

**FTTS** **1009523304**  
**HIST FTTS** **N/A**

**Site 8 of 10 in cluster A**

**Actual:**  
**713 ft.**

FTTS INSP:

Inspection Number: 19960604OH029 1  
Region: 05  
Inspection Date: 06/04/96  
Inspector: WILDER  
Violation occurred: No  
Investigation Type: Section 6 PCB State Conducted  
Investigation Reason: Neutral Scheme, State  
Legislation Code: TSCA  
Facility Function: User

HIST FTTS INSP:

Inspection Number: 19960604OH029 1  
Region: 05  
Inspection Date: Not reported  
Inspector: WILDER  
Violation occurred: No  
Investigation Type: Section 6 PCB State Conducted  
Investigation Reason: Neutral Scheme, State  
Legislation Code: TSCA  
Facility Function: User

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**A9**  
**Target**  
**Property**

**SK HAND TOOLS**  
**135 HICKORY ST**  
**DEFIANCE, OH 43512**

**FTTS** **1009523303**  
**HIST FTTS** **N/A**

**Site 9 of 10 in cluster A**

**Actual:**  
**713 ft.**

**FTTS:**

Case Number: Not reported  
Docket Number: 5-TSCA-97-011  
Complaint Issue Date: 06/20/97  
Abatement Amount: 0.0000  
Proposed Penalty: 95000.0000  
Final Assessment: 0.0000  
Final Order Date: 01/09/98  
Close Date: / /  
Violations(s): Use; Fail to Inspect/Make Recs of Inspect  
PCB, Use  
PCB, Label or Marking  
PCB, Failure to Report

**HIST FTTS:**

Case Number: Not reported  
Docket Number: 5-TSCA-97-011  
Complaint Issue Date: 06/20/1997  
Abatement Amount: 0.0000  
Proposed Penalty: 95000.0000  
Final Assessment: 0.0000  
Final Order Date: 01/09/1998  
Close Date: / /  
Violations(s): Use; Fail to Inspect/Make Recs of Inspect  
PCB, Use  
PCB, Label or Marking  
PCB, Failure to Report

**A10**  
**Target**  
**Property**

**SK HAND TOOL CORP**  
**135 HICKORY ST. DEFIANCE OH 43512**  
**DEFIANCE, OH 43512**

**ICIS** **1011599480**  
**N/A**

**Site 10 of 10 in cluster A**

**Actual:**  
**713 ft.**

**ICIS:**

Enforcement Action ID: 05-1997-0031  
FRS ID: 110000383558  
Program ID: AIRS/AFS 3903900022  
Action Name: SK HAND TOOLS  
Facility Name: SK HAND TOOL CORP  
Facility Address: 135 HICKORY ST. DEFIANCE OH 43512  
DEFIANCE, Ohio 43512  
Enforcement Action Type: TSCA 16 Action For Penalty  
Facility County: Defiance  
EPA Region #: 5  
  
Enforcement Action ID: 05-1997-0031  
FRS ID: 110000383558  
Program ID: FRS 110000383558  
Action Name: SK HAND TOOLS  
Facility Name: SK HAND TOOL CORP

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1011599480**

Facility Address: 135 HICKORY ST. DEFIANCE OH 43512  
DEFIANCE, Ohio 43512  
Enforcement Action Type: TSCA 16 Action For Penalty  
Facility County: Defiance  
EPA Region #: 5  
  
Enforcement Action ID: 05-1997-0031  
FRS ID: 110000383558  
Program ID: OH-CORE 12940  
Action Name: SK HAND TOOLS  
Facility Name: SK HAND TOOL CORP  
Facility Address: 135 HICKORY ST. DEFIANCE OH 43512  
DEFIANCE, Ohio 43512  
Enforcement Action Type: TSCA 16 Action For Penalty  
Facility County: Defiance  
EPA Region #: 5  
  
Enforcement Action ID: 05-1997-0031  
FRS ID: 110000383558  
Program ID: NCDB I05#19960604OH029 1  
Action Name: SK HAND TOOLS  
Facility Name: SK TOOLS  
Facility Address: 135 HICKORY ST. DEFIANCE OH 43512  
DEFIANCE, Ohio 43512  
Enforcement Action Type: TSCA 16 Action For Penalty  
Facility County: Defiance  
EPA Region #: 5  
  
Enforcement Action ID: 05-1997-0031  
FRS ID: 110000383558  
Program ID: TRIS 43512SKHND135HI  
Action Name: SK HAND TOOLS  
Facility Name: SK HAND TOOL CORP  
Facility Address: 135 HICKORY ST. DEFIANCE OH 43512  
DEFIANCE, Ohio 43512  
Enforcement Action Type: TSCA 16 Action For Penalty  
Facility County: Defiance  
EPA Region #: 5  
  
Enforcement Action ID: 05-1997-0031  
FRS ID: 110000383558  
Program ID: BR OHD045247350  
Action Name: SK HAND TOOLS  
Facility Name: SK HAND TOOL CORPORATION  
Facility Address: 135 HICKORY ST. DEFIANCE OH 43512  
DEFIANCE, Ohio 43512  
Enforcement Action Type: TSCA 16 Action For Penalty  
Facility County: Defiance  
EPA Region #: 5  
  
Enforcement Action ID: 05-1997-0031  
FRS ID: 110000383558  
Program ID: NCDB D05#5-TSCA-97-011  
Action Name: SK HAND TOOLS  
Facility Name: SK HAND TOOLS  
Facility Address: 135 HICKORY ST. DEFIANCE OH 43512  
DEFIANCE, Ohio 43512

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1011599480**

Enforcement Action Type: TSCA 16 Action For Penalty  
Facility County: Defiance  
EPA Region #: 5  
  
Enforcement Action ID: 05-1997-0031  
FRS ID: 110000383558  
Program ID: RCRAINFO OHD045247350  
Action Name: SK HAND TOOLS  
Facility Name: SK HAND TOOL CORP  
Facility Address: 135 HICKORY ST. DEFIANCE OH 43512  
DEFIANCE, Ohio 43512  
  
Enforcement Action Type: TSCA 16 Action For Penalty  
Facility County: Defiance  
EPA Region #: 5

Program ID: AIRS/AFS 3903900022  
Facility Name: SK HAND TOOL CORP  
Address: 135 HICKORY ST.  
Tr bal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 3423  
Latitude: 41.280923  
Longitude: -84.340595

Program ID: BR OHD045247350  
Facility Name: SK HAND TOOL CORP  
Address: 135 HICKORY ST.  
Tr bal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 3423  
Latitude: 41.280923  
Longitude: -84.340595

Program ID: FRS 110000383558  
Facility Name: SK HAND TOOL CORP  
Address: 135 HICKORY ST.  
Tr bal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 3423  
Latitude: 41.280923  
Longitude: -84.340595

Program ID: NCDB D05#5-TSCA-97-011  
Facility Name: SK HAND TOOL CORP  
Address: 135 HICKORY ST.  
Tr bal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 3423  
Latitude: 41.280923  
Longitude: -84.340595

Program ID: NCDB I05#19960604OH029 1

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**SK HAND TOOL CORP (Continued)**

**1011599480**

Facility Name: SK HAND TOOL CORP  
Address: 135 HICKORY ST.  
Tr bal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 3423  
Latitude: 41.280923  
Longitude: -84.340595

Program ID: OH-CORE 12940  
Facility Name: SK HAND TOOL CORP  
Address: 135 HICKORY ST.  
Tr bal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 3423  
Latitude: 41.280923  
Longitude: -84.340595

Program ID: RCRAINFO OHD045247350  
Facility Name: SK HAND TOOL CORP  
Address: 135 HICKORY ST.  
Tr bal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 3423  
Latitude: 41.280923  
Longitude: -84.340595

Program ID: TRIS 43512SKHND135HI  
Facility Name: SK HAND TOOL CORP  
Address: 135 HICKORY ST.  
Tr bal Indicator: N  
Fed Facility: No  
NAIC Code: Not reported  
SIC Code: 3423  
Latitude: 41.280923  
Longitude: -84.340595

11  
South  
1/8-1/4  
0.171 mi.  
901 ft.

**JOHNS MANVILLE INTERNATIONAL INC**  
**COLUMBUS AVE**  
**DEFIANCE, OH 43512**

**RCRA-SQG 1000433091**  
**OHD980680748**

**Relative:**  
**Lower**

RCRA-SQG:

Date form received by agency: 07/07/1997  
Facility name: JOHNS MANVILLE INTERNATIONAL INC  
Facility address: COLUMBUS AVE  
DEFIANCE, OH 43512  
EPA ID: OHD980680748  
Mailing address: P O BOX 7188  
DEFIANCE, OH 43512  
Contact: NED EWERS  
Contact address: P O BOX 7188  
DEFIANCE, OH 43512  
Contact country: US  
Contact telephone: (419) 784-7962

**Actual:**  
**712 ft.**

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**JOHNS MANVILLE INTERNATIONAL INC (Continued)**

**1000433091**

Contact email: Not reported  
EPA Region: 05  
Land type: Private  
Classification: Small Small Quantity Generator  
Description: Handler: generates more than 100 and less than 1000 kg of hazardous waste during any calendar month and accumulates less than 6000 kg of hazardous waste at any time; or generates 100 kg or less of hazardous waste during any calendar month, and accumulates more than 1000 kg of hazardous waste at any time

**Owner/Operator Summary:**

Owner/operator name: JOHN MANVILLE CORPORATION  
Owner/operator address: P O BOX 5108  
DENVER, CO 80217  
Owner/operator country: Not reported  
Owner/operator telephone: (303) 978-2000  
Legal status: Private  
Owner/Operator Type: Owner  
Owner/Op start date: Not reported  
Owner/Op end date: Not reported

Owner/operator name: NAME NOT REPORTED  
Owner/operator address: ADDRESS NOT REPORTED  
CITY NOT REPORTED, AK 99998

Owner/operator country: Not reported  
Owner/operator telephone: (312) 555-1212  
Legal status: Private  
Owner/Operator Type: Operator  
Owner/Op start date: Not reported  
Owner/Op end date: Not reported

**Handler Activities Summary:**

U.S. importer of hazardous waste: No  
Mixed waste (haz. and radioactive): No  
Recycler of hazardous waste: No  
Transporter of hazardous waste: No  
Treater, storer or disposer of HW: No  
Underground injection activity: No  
On-site burner exemption: No  
Furnace exemption: No  
Used oil fuel burner: No  
Used oil processor: No  
Used oil refiner: No  
Used oil fuel marketer to burner: No  
Used oil Specification marketer: No  
Used oil transfer facility: No  
Used oil transporter: No

**Hazardous Waste Summary:**

Waste code: D001  
Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKEY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT



Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**JOHNS MANVILLE INTERNATIONAL INC (Continued)**

**1000433091**

WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Waste code: D002  
Waste name: A WASTE WHICH HAS A PH OF LESS THAN 2 OR GREATER THAN 12.5 IS CONSIDERED TO BE A CORROSIVE HAZARDOUS WASTE. SODIUM HYDROXIDE, A CAUSTIC SOLUTION WITH A HIGH PH, IS OFTEN USED BY INDUSTRIES TO CLEAN OR DEGREASE PARTS. HYDROCHLORIC ACID, A SOLUTION WITH A LOW PH, IS USED BY MANY INDUSTRIES TO CLEAN METAL PARTS PRIOR TO PAINTING. WHEN THESE CAUSTIC OR ACID SOLUTIONS BECOME CONTAMINATED AND MUST BE DISPOSED, THE WASTE WOULD BE A CORROSIVE HAZARDOUS WASTE.

Waste code: D004  
Waste name: ARSENIC

Waste code: D005  
Waste name: BARIUM

Waste code: D006  
Waste name: CADMIUM

Waste code: D007  
Waste name: CHROMIUM

Waste code: D008  
Waste name: LEAD

Waste code: D009  
Waste name: MERCURY

Waste code: D010  
Waste name: SELENIUM

Waste code: D011  
Waste name: SILVER

Waste code: D018  
Waste name: BENZENE

Waste code: D027  
Waste name: 1,4-DICHLOROBENZENE

Violation Status: No violations found

**Evaluation Action Summary:**

Evaluation date: 10/05/2011  
Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE  
Area of violation: Not reported  
Date achieved compliance: Not reported  
Evaluation lead agency: State

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**B12**  
**NW**  
**1/8-1/4**  
**0.174 mi.**  
**921 ft.**

**DEFIANCE HOSPITAL, INC.**  
**1206 E 2ND ST**  
**DEFIANCE, OH 43512**

**Site 1 of 2 in cluster B**

**OH LUST**  
**OH UST**

**U004203661**  
**N/A**

**Relative:**  
**Lower**

**LUST:**

Release Number: 20000006-N00001  
Release Date: Not reported  
**Facility Status: Inactive**  
LTF Status: 6 Closure of regulated UST  
**FR Status: NFA: No Further Action**  
Priority: 3  
Review Date: 06/20/2000  
Class: Viable Responsible Party has been identified

**Actual:**  
**700 ft.**

**UST:**

Facility Id: 20000006  
Facility Type: Other  
Owner Name: Not reported  
Owner Address: Not reported  
Owner City/State/Zip: Not reported  
  
Tank Number: T00001  
Status: CIS - Change in Service  
UST Capacity: 12000  
Tank Content: Heating Oil  
Installation Date: 01/01/1983  
Construction: BM - Bare Metal  
Date Last Used: Not reported  
Date TCL Closed: Not reported  
Date Removed: Not reported  
CAS Number: 68476-30-2  
Abandoned Approved: Not reported  
Regulated: NO  
Sensitive Area: NO  
Date Of Sensitivity: Not reported  
UST Configurations: Not reported  
Construction Comments: Cathodically Protected Steel  
Corrosion Protections: NR - None Required by Rule  
Corrosion Protection Comments: Not reported  
Primary Release Detection: NR - None Required by Rule  
Secondary Release Detection: Not reported  
Release Detection Comments: RDTank: None Required (Emergency Generator UST) / RDLine:  
Piping Configuration: Not reported  
Piping Configuration Comments: Not reported  
Piping Styles: S - Suction  
Piping Constructions: BM - Bare Metal  
Piping Construction Comments: Cathodically Protected  
Piping Corrosion Protections: NR - None required by rule  
Piping Corrosion Protection Comments: Not reported  
Piping Release Detections: OTH - Other(explain)  
Piping Release Detection Comments: None Required (Emergency Generator UST)  
Spill Prevention Manholes: SB - Spill Containment Manhole (bucket)  
Spill Prevention Manhole Comments: Yes  
OverFill Prevention: Not reported  
OverFill Prevention Comment: OverFill Spill: Yes  
Comments: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**DEFIANCE HOSPITAL, INC. (Continued)**

**U004203661**

Tank Number: T00002  
Status: REM - Removed  
UST Capacity: 375  
Tank Content: Gasoline  
Installation Date: 01/01/1983  
Construction: BM - Bare Metal  
Date Last Used: 01/19/1998  
Date TCL Closed: Not reported  
Date Removed: 01/19/1998  
CAS Number: 8006-61-9  
Abandoned Approved: Not reported  
Regulated: YES  
Sensitive Area: NO  
Date Of Sensitivity: Not reported  
UST Configurations: Not reported  
Construction Comments: Steel  
Corrosion Protections: Not reported  
Corrosion Protection Comments: Not reported  
Primary Release Detection: AMO - Alternative Method (Other, explain)  
Secondary Release Detection: Not reported  
Release Detection Comments: RDTank: / RDLine:  
Piping Configuration: Not reported  
Piping Configuration Comments: Not reported  
Piping Styles: S - Suction  
Piping Constructions: OTH - Other (explain)  
Piping Construction Comments: Unknown  
Piping Corrosion Protections: OTH - Other (explain)  
Piping Corrosion Protection Comments: Not reported  
Piping Release Detections: OTH - Other(explain)  
Piping Release Detection Comments: Not reported  
Spill Prevention Manholes: NP - None Present  
Spill Prevention Manhole Comments: No  
OverFill Prevention: Not reported  
OverFill Prevention Comment: OverFill Spill: No  
Comments: Not reported

**B13  
NW  
1/8-1/4  
0.174 mi.  
921 ft.**

**DEFIANCE HOSPITAL INC  
1206 E SECOND ST  
DEFIANCE, OH**

**Site 2 of 2 in cluster B**

**RCRA NonGen / NLR  
MLTS  
FINDS  
OH ARCHIVE UST**

**1000245958  
OHD077575298**

**Relative:  
Lower**

RCRA NonGen / NLR:

Date form received by agency: 08/13/2004  
Facility name: DEFIANCE HOSPITAL  
Facility address: 1206 E SECOND ST  
DEFIANCE, OH 43512  
EPA ID: OHD077575298  
Mailing address: 1200 RALSTON RD  
DEFIANCE, OH 43512  
Contact: SUSAN RASZKA  
Contact address: 2121 HUGHES DR  
TOLEDO, OH 43606  
Contact country: US  
Contact telephone: Not reported  
Contact email: WWW.PROMEDICA.ORG  
EPA Region: 05  
Classification: Non-Generator

**Actual:  
700 ft.**

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**DEFIANCE HOSPITAL INC (Continued)**

**1000245958**

Description: Handler: Non-Generators do not presently generate hazardous waste

Owner/Operator Summary:

Owner/operator name: DEFIANCE REGIONAL MED CTR  
Owner/operator address: 1200 RALSTON RD  
DEFIANCE, OH 43512  
Owner/operator country: US  
Owner/operator telephone: (419) 783-6955  
Legal status: Private  
Owner/Operator Type: Operator  
Owner/Op start date: 01/01/1949  
Owner/Op end date: Not reported

Owner/operator name: PRO MEDICA HEALTH SYSTEM  
Owner/operator address: 2121 HUGHES DR  
TOLEDO, OH 43606  
Owner/operator country: US  
Owner/operator telephone: (419) 291-6706  
Legal status: Private  
Owner/Operator Type: Owner  
Owner/Op start date: 08/01/1998  
Owner/Op end date: Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: No  
Mixed waste (haz. and radioactive): No  
Recycler of hazardous waste: No  
Transporter of hazardous waste: No  
Treater, storer or disposer of HW: No  
Underground injection activity: No  
On-site burner exemption: No  
Furnace exemption: No  
Used oil fuel burner: No  
Used oil processor: No  
Used oil refiner: No  
Used oil fuel marketer to burner: No  
Used oil Specification marketer: No  
Used oil transfer facility: No  
Used oil transporter: No

Historical Generators:

Date form received by agency: 06/03/2004  
Facility name: DEFIANCE HOSPITAL  
Classification: Large Quantity Generator

Date form received by agency: 03/20/1986  
Facility name: DEFIANCE HOSPITAL  
Site name: DEFIANCE HOSPITAL INC  
Classification: Small Quantity Generator

Hazardous Waste Summary:

Waste code: D001  
Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKEY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**DEFIANCE HOSPITAL INC (Continued)**

**1000245958**

FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Waste code: D002

Waste name: A WASTE WHICH HAS A PH OF LESS THAN 2 OR GREATER THAN 12.5 IS CONSIDERED TO BE A CORROSIVE HAZARDOUS WASTE. SODIUM HYDROXIDE, A CAUSTIC SOLUTION WITH A HIGH PH, IS OFTEN USED BY INDUSTRIES TO CLEAN OR DEGREASE PARTS. HYDROCHLORIC ACID, A SOLUTION WITH A LOW PH, IS USED BY MANY INDUSTRIES TO CLEAN METAL PARTS PRIOR TO PAINTING. WHEN THESE CAUSTIC OR ACID SOLUTIONS BECOME CONTAMINATED AND MUST BE DISPOSED, THE WASTE WOULD BE A CORROSIVE HAZARDOUS WASTE.

Waste code: D003

Waste name: A MATERIAL IS CONSIDERED TO BE A REACTIVE HAZARDOUS WASTE IF IT IS NORMALLY UNSTABLE, REACTS VIOLENTLY WITH WATER, GENERATES TOXIC GASES WHEN EXPOSED TO WATER OR CORROSIVE MATERIALS, OR IF IT IS CAPABLE OF DETONATION OR EXPLOSION WHEN EXPOSED TO HEAT OR A FLAME. ONE EXAMPLE OF SUCH WASTE WOULD BY WASTE GUNPOWDER.

Waste code: D009

Waste name: MERCURY

Waste code: F003

Waste name: THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: XYLENE, ACETONE, ETHYL ACETATE, ETHYL BENZENE, ETHYL ETHER, METHYL ISOBUTYL KETONE, N-BUTYL ALCOHOL, CYCLOHEXANONE, AND METHANOL; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONLY THE ABOVE SPENT NON-HALOGENATED SOLVENTS; AND ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS, AND, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THOSE SOLVENTS LISTED IN F001, F002, F004, AND F005, AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

Waste code: F005

Waste name: THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: TOLUENE, METHYL ETHYL KETONE, CARBON DISULFIDE, ISOBUTANOL, PYRIDINE, BENZENE, 2-ETHOXYETHANOL, AND 2-NITROPROPANE; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS OR THOSE SOLVENTS LISTED IN F001, F002, OR F004; AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

Violation Status: No violations found

**MLTS:**

License Number: 34-15654-01  
First License Date: 01/20/74  
License Date: 12/31/97  
Lic. Expiration Date: 07/31/00  
Contact Name: ANDREW SCHNEIDER  
Contact Phone: 419/783-6955  
Institution Code: 15654  
Department/Bldg: Not reported  
States Allowing Use: Not reported  
Store Material Use: No

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**DEFIANCE HOSPITAL INC (Continued)**

**1000245958**

Redistribution Use: No  
Incinerate Use: No  
Burial Use: No  
Last Inspection Date: 12/01/97  
Next Inspection Date: 12/01/02  
Licensee Contact: PH.D/R.S.O.  
Inspector Name: ANDREW SCHNEIDER

**FINDS:**

Registry ID: 110004623293

**Environmental Interest/Information System**

US EPA Air Quality System (AQS) contains ambient air pollution data collected by EPA, State, Local, and Tribal air pollution control agencies from thousands of monitoring stations.

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

The OH-CORE (Ohio - Core) database contains information commonly shared among the Ohio EPA environmental programs. The information is facility-based, general in nature, and used to support specific programmatic systems while simultaneously maintaining an inventory of common facility-related data. Specific programmatic details are maintained in programmatic databases.

**ARCHIVE UST:**

Facility Number: 20000006

**Permit:**

Facility Id: 20000006  
Permit Id: P00001  
Permit Status: Expired  
Issued Date: 12/31/1997  
Lfd Permit Id: Not reported

**Inspection:**

Facility Id: 20000006  
Code: 103  
Permit Number: P00001  
Inspection Type: Final

**Tanks:**

Tank ID: T00001  
**Tank Status:** **Currently In Use**  
Tank Type: Cathodically Protected Steel  
Capacity: 12000  
Content: Diesel  
CAS #: Not reported  
Regulated: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**DEFIANCE HOSPITAL INC (Continued)**

**1000245958**

Overfill Device Installed: Not reported  
Spill Device Installed: Not reported  
Installation Date: Not reported  
Date Removed: Not reported  
Date Last Used: Not reported  
Date Abandoned/Closed: Not reported  
Corrosion Protection Tank: Not reported  
Release Detection on Tank: Not reported  
Corrosion Protection Piping: Not reported  
Piping Material: Not reported  
Piping Type: Not reported  
Release Detection on Piping: Not reported

**14**  
**ENE**  
**1/4-1/2**  
**0.344 mi.**  
**1814 ft.**

**FORMER SOHIO #06534**  
**1747 E 2ND ST**  
**DEFIANCE, OH 43512**

**OH LUST** **U004091291**  
**N/A**

**Relative:**  
**Higher**

**LUST:**

Release Number: 20009989-N00001  
Release Date: 12/13/1991  
**Facility Status: Inactive**  
LTF Status: 1 SUS/CON from regulated UST  
**FR Status: NFA: No Further Action**  
Priority: 2  
Review Date: 02/28/2002  
Class: Viable Responsible Party has been identified

**15**  
**East**  
**1/4-1/2**  
**0.357 mi.**  
**1885 ft.**

**WAYNE GLORE TRUCKING, INC.**  
**1790 SPRUCE ST**  
**DEFIANCE, OH 43512**

**OH LUST** **U004203704**  
**OH UST** **N/A**

**Relative:**  
**Higher**

**LUST:**

Release Number: 20000123-N00001  
Release Date: Not reported  
**Facility Status: Inactive**  
LTF Status: 6 Closure of regulated UST  
**FR Status: NFA: No Further Action**  
Priority: 3  
Review Date: 06/20/2000  
Class: Viable Responsible Party has been identified

Release Number: 20000123-N00002  
Release Date: 07/20/1993  
**Facility Status: Inactive**  
LTF Status: 6 Closure of regulated UST  
**FR Status: NFA: No Further Action**  
Priority: 3  
Review Date: 08/14/2003  
Class: Viable Responsible Party has been identified



Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**WAYNE GLORE TRUCKING, INC. (Continued)**

**U004203704**

UST:

Facility Id: 20000123  
Facility Type: Gas Station  
Owner Name: Not reported  
Owner Address: Not reported  
Owner City/State/Zip: Not reported  
  
Tank Number: T00001  
Status: REM - Removed  
UST Capacity: 10000  
Tank Content: Diesel  
Installation Date: 07/01/1977  
Construction: FRP-Fiberglass Reinforced Plastic  
Date Last Used: 06/03/1993  
Date TCL Closed: Not reported  
Date Removed: 06/03/1993  
CAS Number: 68334-30-5  
Abandoned Approved: Not reported  
Regulated: YES  
Sensitive Area: NO  
Date Of Sensitivity: Not reported  
UST Configurations: Not reported  
Construction Comments: Fiberglass Reinforced Plastic  
Corrosion Protections: Not reported  
Corrosion Protection Comments: Not reported  
Primary Release Detection: AMO - Alternative Method (Other, explain)  
Secondary Release Detection: Not reported  
Release Detection Comments: RDTank: / RDLine:  
Piping Configuration: Not reported  
Piping Configuration Comments: Not reported  
Piping Styles: P - Pressure  
Piping Constructions: FRP - Fiberglass Reinforced Plastic  
Piping Construction Comments: Fiberglass Reinforced Plastic  
Piping Corrosion Protections: OTH - Other (explain)  
Piping Corrosion Protection Comments: Not reported  
Piping Release Detections: OTH - Other(explain)  
Piping Release Detection Comments: Not reported  
Spill Prevention Manholes: NP - None Present  
Spill Prevention Manhole Comments: No  
OverFill Prevention: Not reported  
OverFill Prevention Comment: OverFill Spill: No  
Comments: Not reported

Tank Number: T00002  
Status: REM - Removed  
UST Capacity: 10000  
Tank Content: Diesel  
Installation Date: 07/01/1977  
Construction: FRP-Fiberglass Reinforced Plastic  
Date Last Used: 06/03/1993  
Date TCL Closed: Not reported  
Date Removed: 06/03/1993  
CAS Number: 68334-30-5  
Abandoned Approved: Not reported  
Regulated: YES  
Sensitive Area: NO

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**WAYNE GLORE TRUCKING, INC. (Continued)**

**U004203704**

Date Of Sensitivity: Not reported  
UST Configurations: Not reported  
Construction Comments: Fiberglass Reinforced Plastic  
Corrosion Protections: Not reported  
Corrosion Protection Comments: Not reported  
Primary Release Detection: AMO - Alternative Method (Other, explain)  
Secondary Release Detection: Not reported  
Release Detection Comments: RDTank: / RDLine:  
Piping Configuration: Not reported  
Piping Configuration Comments: Not reported  
Piping Styles: P - Pressure  
Piping Constructions: FRP - Fiberglass Reinforced Plastic  
Piping Construction Comments: Fiberglass Reinforced Plastic  
Piping Corrosion Protections: OTH - Other (explain)  
Piping Corrosion Protection Comments: Not reported  
Piping Release Detections: OTH - Other(explain)  
Piping Release Detection Comments: Not reported  
Spill Prevention Manholes: NP - None Present  
Spill Prevention Manhole Comments: No  
OverFill Prevention: Not reported  
OverFill Prevention Comment: OverFill Spill: No  
Comments: Not reported

Tank Number: T00003  
Status: REM - Removed  
UST Capacity: Not reported  
Tank Content: Unknown  
Installation Date: Not reported  
Construction: Not reported  
Date Last Used: 07/20/1993  
Date TCL Closed: Not reported  
Date Removed: 07/20/1993  
CAS Number: Not reported  
Abandoned Approved: Not reported  
Regulated: YES  
Sensitive Area: NO  
Date Of Sensitivity: Not reported  
UST Configurations: Not reported  
Construction Comments: Not reported  
Corrosion Protections: Not reported  
Corrosion Protection Comments: Not reported  
Primary Release Detection: AMO - Alternative Method (Other, explain)  
Secondary Release Detection: Not reported  
Release Detection Comments: RDTank: / RDLine:  
Piping Configuration: Not reported  
Piping Configuration Comments: Not reported  
Piping Styles: NA - Not Applicable  
Piping Constructions: OTH - Other (explain)  
Piping Construction Comments: Not reported  
Piping Corrosion Protections: OTH - Other (explain)  
Piping Corrosion Protection Comments: Not reported  
Piping Release Detections: OTH - Other(explain)  
Piping Release Detection Comments: Not reported  
Spill Prevention Manholes: NP - None Present  
Spill Prevention Manhole Comments: No  
OverFill Prevention: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**WAYNE GLORE TRUCKING, INC. (Continued)**

**U004203704**

OverFill Prevention Comment: OverFill Spill: No  
Comments: Not reported

**16**  
**East**  
**1/2-1**  
**0.760 mi.**  
**4011 ft.**

**INTEGRITY DEFIANCE AUTO BODY**  
**1956 SPRUCE ST**  
**DEFIANCE, OH 43512**

**CORRACTS**  
**RCRA-SQG**  
**FINDS**

**1001029291**  
**OHR000003376**

**Relative:**  
**Higher**

**CORRACTS:**

**Actual:**  
**719 ft.**

EPA ID: OHR000003376  
EPA Region: 05  
Area Name: ENTIRE FACILITY  
Actual Date: 20060701  
Action: CA001  
NAICS Code(s): Not reported  
Original schedule date: Not reported  
Schedule end date: Not reported

**RCRA-SQG:**

Date form received by agency: 05/31/1995  
Facility name: INTEGRITY DEFIANCE AUTO BODY  
Facility address: 1956 SPRUCE ST  
DEFIANCE, OH 43512  
EPA ID: OHR000003376  
Mailing address: 20390 ST RT 24W  
DEFIANCE, OH 43512  
Contact: ED GILMORE  
Contact address: 20390 ST RT 24W  
DEFIANCE, OH 43512  
Contact country: US  
Contact telephone: (419) 784-4808  
Contact email: Not reported  
EPA Region: 05  
Land type: Private  
Classification: Small Small Quantity Generator  
Description: Handler: generates more than 100 and less than 1000 kg of hazardous waste during any calendar month and accumulates less than 6000 kg of hazardous waste at any time; or generates 100 kg or less of hazardous waste during any calendar month, and accumulates more than 1000 kg of hazardous waste at any time

**Owner/Operator Summary:**

Owner/operator name: JAMES HERMILLER  
Owner/operator address: 24923DEFIANCE-PAULDING LINE RD  
DEFIANCE, OH 43512  
Owner/operator country: Not reported  
Owner/operator telephone: (419) 393-2864  
Legal status: Private  
Owner/Operator Type: Owner  
Owner/Op start date: Not reported  
Owner/Op end date: Not reported

**Handler Activities Summary:**

U.S. importer of hazardous waste: No

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**INTEGRITY DEFIANCE AUTO BODY (Continued)**

**1001029291**

Mixed waste (haz. and radioactive): No  
Recycler of hazardous waste: No  
Transporter of hazardous waste: No  
Treater, storer or disposer of HW: No  
Underground injection activity: No  
On-site burner exemption: No  
Furnace exemption: No  
Used oil fuel burner: No  
Used oil processor: No  
User oil refiner: No  
Used oil fuel marketer to burner: No  
Used oil Specification marketer: No  
Used oil transfer facility: No  
Used oil transporter: No

**Hazardous Waste Summary:**

Waste code: F001

Waste name: THE FOLLOWING SPENT HALOGENATED SOLVENTS USED IN DEGREASING: TETRACHLOROETHYLENE, TRICHLOROETHYLENE, METHYLENE CHLORIDE, 1,1,1-TRICHLOROETHANE, CARBON TETRACHLORIDE, AND CHLORINATED FLUOROCARBONS; ALL SPENT SOLVENT MIXTURES/BLENDS USED IN DEGREASING CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THE ABOVE HALOGENATED SOLVENTS OR THOSE SOLVENTS LISTED IN F002, F004, AND F005, AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

Waste code: F005

Waste name: THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: TOLUENE, METHYL ETHYL KETONE, CARBON DISULFIDE, ISOBUTANOL, PYRIDINE, BENZENE, 2-ETHOXYETHANOL, AND 2-NITROPROPANE; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS OR THOSE SOLVENTS LISTED IN F001, F002, OR F004; AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

**Corrective Action Summary:**

Event date: 07/01/2006  
Event: CA001

**Facility Has Received Notices of Violations:**

Regulation violated: SR - 3745-66-74(B)  
Area of violation: TSD - Container Use and Management  
Date violation determined: 03/01/1997  
Date achieved compliance: 05/28/1997  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/19/1997  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-66-74(B)  
Area of violation: TSD - Container Use and Management

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**INTEGRITY DEFIANCE AUTO BODY (Continued)**

**1001029291**

Date violation determined: 03/01/1997  
Date achieved compliance: 05/28/1997  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 06/09/1997  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-34(A)(2)(3)  
Area of violation: Generators - Pre-transport  
Date violation determined: 02/11/1997  
Date achieved compliance: 05/28/1997  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 06/09/1997  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-66-73(A)  
Area of violation: TSD - Container Use and Management  
Date violation determined: 02/11/1997  
Date achieved compliance: 05/28/1997  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/19/1997  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-34(A)(2)(3)  
Area of violation: Generators - Pre-transport  
Date violation determined: 02/11/1997  
Date achieved compliance: 05/28/1997  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/19/1997  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-33(A)(B)  
Area of violation: TSD - Preparedness and Prevention  
Date violation determined: 02/11/1997

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**INTEGRITY DEFIANCE AUTO BODY (Continued)**

**1001029291**

Date achieved compliance: 05/28/1997  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/19/1997  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3734.02(F)  
Area of violation: TSD - General  
Date violation determined: 02/11/1997  
Date achieved compliance: 05/28/1997  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 06/09/1997  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-66-73(A)  
Area of violation: TSD - Container Use and Management  
Date violation determined: 02/11/1997  
Date achieved compliance: 05/28/1997  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 06/09/1997  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-11  
Area of violation: Generators - General  
Date violation determined: 02/11/1997  
Date achieved compliance: 05/28/1997  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/19/1997  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-52-11  
Area of violation: Generators - General  
Date violation determined: 02/11/1997  
Date achieved compliance: 05/28/1997

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**INTEGRITY DEFIANCE AUTO BODY (Continued)**

**1001029291**

Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 06/09/1997  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3734.02(F)  
Area of violation: TSD - General  
Date violation determined: 02/11/1997  
Date achieved compliance: 05/28/1997  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 02/19/1997  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Regulation violated: SR - 3745-65-33(A)(B)  
Area of violation: TSD - Preparedness and Prevention  
Date violation determined: 02/11/1997  
Date achieved compliance: 05/28/1997  
Violation lead agency: State  
Enforcement action: WRITTEN INFORMAL  
Enforcement action date: 06/09/1997  
Enf. disposition status: Not reported  
Enf. disp. status date: Not reported  
Enforcement lead agency: State  
Proposed penalty amount: Not reported  
Final penalty amount: Not reported  
Paid penalty amount: Not reported

Evaluation Action Summary:  
Evaluation date: 02/11/1997  
Evaluation: FOCUSED COMPLIANCE INSPECTION  
Area of violation: TSD - General  
Date achieved compliance: 05/28/1997  
Evaluation lead agency: State

Evaluation date: 02/11/1997  
Evaluation: FOCUSED COMPLIANCE INSPECTION  
Area of violation: Generators - Pre-transport  
Date achieved compliance: 05/28/1997  
Evaluation lead agency: State

Evaluation date: 02/11/1997  
Evaluation: FOCUSED COMPLIANCE INSPECTION  
Area of violation: TSD - Container Use and Management  
Date achieved compliance: 05/28/1997  
Evaluation lead agency: State



Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

**INTEGRITY DEFIANCE AUTO BODY (Continued)**

**1001029291**

Evaluation date: 02/11/1997  
Evaluation: FOCUSED COMPLIANCE INSPECTION  
Area of violation: TSD - Preparedness and Prevention  
Date achieved compliance: 05/28/1997  
Evaluation lead agency: State

Evaluation date: 02/11/1997  
Evaluation: FOCUSED COMPLIANCE INSPECTION  
Area of violation: Generators - General  
Date achieved compliance: 05/28/1997  
Evaluation lead agency: State

**FINDS:**

Registry ID: 110004709806

**Environmental Interest/Information System**

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

The OH-CORE (Ohio - Core) database contains information commonly shared among the Ohio EPA environmental programs. The information is facility-based, general in nature, and used to support specific programmatic systems while simultaneously maintaining an inventory of common facility-related data. Specific programmatic details are maintained in programmatic databases.

Count: 20 records.

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
DEFIANCE	U004096042	MEL CHAPMAN PROPERTY	14196 SR 111	43512	OH LUST
DEFIANCE	1004767757	MATLACK INC - DEFIANCE OH SPILL	RT 24 & CARPENTER RD	43512	RCRA-LQG
DEFIANCE	U004100228	ROYAL MART	SR 281	43512	OH LUST
DEFIANCE	U004203698	WANETA KOCHER	RT 5	43512	OH UST
DEFIANCE	U000689820	WANETA KOCHER	RT 5	43512	OH ARCHIVE UST
DEFIANCE	1000694548	MOATS MARK FORD	RTE 5 US 24 W	43512	RCRA-SQG
DEFIANCE	1000161239	WEBB BROS TRUCKING AND EXCAVATING	RTE 5 6 MI FROM DEFIANCE	43512	RCRA NonGen / NLR
DEFIANCE	U004102344	CABBAGE PATCH CONVENIENCE STORE	19492 SR 637	43512	OH LUST, OH UST, OH ARCHIVE US
DEFIANCE	1003872655	ANR PIPELINE	HIGHWAY 66 NORTH	43512	CERC-NFRAP, OH DERR
DEFIANCE	1016306886	PERRY STREET HOME SITE	PERRY STREET		FINDS
DEFIANCE	1007057498	PERRY STREET HOME SITE	PERRY STREET	43512	US BROWNFIELDS
DEFIANCE	U004104543	WEBB BROS.	15976 ST RT 111	43512	OH ARCHIVE UST
DEFIANCE	U004097442	ODNR INDEPENDENCE DAM STATE PARK	27722 ST RT 424	43512	OH ARCHIVE UST
DEFIANCE	U004093025	HIGHLAND MOBILE PARK LLC	14445 ST RT 15	43512	OH ARCHIVE UST
DEFIANCE	U004066593	WILLIAM HOHENBERGER	28970 ST RT 281	43512	OH ARCHIVE UST
DEFIANCE	1007264964	SNS EXPRESS	20597 US RT 24 W	43512	RCRA NonGen / NLR
DEFIANCE	1001029358	INTEGRITY MOTOR SALES INC	20390 ST RT 24 W	43512	RCRA-SQG
DEFIANCE	1001029296	INTEGRITY DEFIANCE AUTO BODY	20390 ST RT 24W		RCRA NonGen / NLR, FINDS
DEFIANCE	1000312064	STONECO INC DEFIANCE PLANT	11325 ST RTE 66		RCRA-SQG, FINDS
WAUSEON	S114565195	BP BULK FACILITY SITE 69289	240 E HICKORY ST	43512	OH DERR

# GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

To maintain currency of the following federal and state databases, EDR contacts the appropriate governmental agency on a monthly or quarterly basis, as required.

**Number of Days to Update:** Provides confirmation that EDR is reporting records that have been updated within 90 days from the date the government agency made the information available to the public.

## STANDARD ENVIRONMENTAL RECORDS

### ***Federal NPL site list***

#### **NPL: National Priority List**

National Priorities List (Superfund). The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices.

Date of Government Version: 10/25/2013	Source: EPA
Date Data Arrived at EDR: 11/11/2013	Telephone: N/A
Date Made Active in Reports: 01/28/2014	Last EDR Contact: 06/10/2014
Number of Days to Update: 78	Next Scheduled EDR Contact: 07/21/2014
	Data Release Frequency: Quarterly

#### **NPL Site Boundaries**

##### **Sources:**

EPA's Environmental Photographic Interpretation Center (EPIC)  
Telephone: 202-564-7333

EPA Region 1  
Telephone 617-918-1143

EPA Region 6  
Telephone: 214-655-6659

EPA Region 3  
Telephone 215-814-5418

EPA Region 7  
Telephone: 913-551-7247

EPA Region 4  
Telephone 404-562-8033

EPA Region 8  
Telephone: 303-312-6774

EPA Region 5  
Telephone 312-886-6686

EPA Region 9  
Telephone: 415-947-4246

EPA Region 10  
Telephone 206-553-8665

#### **Proposed NPL: Proposed National Priority List Sites**

A site that has been proposed for listing on the National Priorities List through the issuance of a proposed rule in the Federal Register. EPA then accepts public comments on the site, responds to the comments, and places on the NPL those sites that continue to meet the requirements for listing.

Date of Government Version: 10/25/2013	Source: EPA
Date Data Arrived at EDR: 11/11/2013	Telephone: N/A
Date Made Active in Reports: 01/28/2014	Last EDR Contact: 06/10/2014
Number of Days to Update: 78	Next Scheduled EDR Contact: 07/21/2014
	Data Release Frequency: Quarterly

#### **NPL LIENS: Federal Superfund Liens**

Federal Superfund Liens. Under the authority granted the USEPA by CERCLA of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner received notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

Date of Government Version: 10/15/1991	Source: EPA
Date Data Arrived at EDR: 02/02/1994	Telephone: 202-564-4267
Date Made Active in Reports: 03/30/1994	Last EDR Contact: 08/15/2011
Number of Days to Update: 56	Next Scheduled EDR Contact: 11/28/2011
	Data Release Frequency: No Update Planned

# GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

## ***Federal Delisted NPL site list***

### **DELISTED NPL: National Priority List Deletions**

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425(e), sites may be deleted from the NPL where no further response is appropriate.

Date of Government Version: 10/25/2013	Source: EPA
Date Data Arrived at EDR: 11/11/2013	Telephone: N/A
Date Made Active in Reports: 01/28/2014	Last EDR Contact: 06/10/2014
Number of Days to Update: 78	Next Scheduled EDR Contact: 07/21/2014
	Data Release Frequency: Quarterly

## ***Federal CERCLIS list***

### **CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System**

CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

Date of Government Version: 10/25/2013	Source: EPA
Date Data Arrived at EDR: 11/11/2013	Telephone: 703-412-9810
Date Made Active in Reports: 02/13/2014	Last EDR Contact: 05/29/2014
Number of Days to Update: 94	Next Scheduled EDR Contact: 09/08/2014
	Data Release Frequency: Quarterly

### **FEDERAL FACILITY: Federal Facility Site Information listing**

A listing of National Priority List (NPL) and Base Realignment and Closure (BRAC) sites found in the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) Database where EPA Federal Facilities Restoration and Reuse Office is involved in cleanup activities.

Date of Government Version: 05/31/2013	Source: Environmental Protection Agency
Date Data Arrived at EDR: 07/08/2013	Telephone: 703-603-8704
Date Made Active in Reports: 12/06/2013	Last EDR Contact: 04/11/2014
Number of Days to Update: 151	Next Scheduled EDR Contact: 07/21/2014
	Data Release Frequency: Varies

## ***Federal CERCLIS NFRAP site List***

### **CERCLIS-NFRAP: CERCLIS No Further Remedial Action Planned**

Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

Date of Government Version: 10/25/2013	Source: EPA
Date Data Arrived at EDR: 11/11/2013	Telephone: 703-412-9810
Date Made Active in Reports: 02/13/2014	Last EDR Contact: 05/29/2014
Number of Days to Update: 94	Next Scheduled EDR Contact: 09/08/2014
	Data Release Frequency: Quarterly

## ***Federal RCRA CORRACTS facilities list***

### **CORRACTS: Corrective Action Report**

CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 03/11/2014  
Date Data Arrived at EDR: 03/13/2014  
Date Made Active in Reports: 04/09/2014  
Number of Days to Update: 27

Source: EPA  
Telephone: 800-424-9346  
Last EDR Contact: 03/13/2014  
Next Scheduled EDR Contact: 07/14/2014  
Data Release Frequency: Quarterly

### ***Federal RCRA non-CORRACTS TSD facilities list***

#### **RCRA-TSDF: RCRA - Treatment, Storage and Disposal**

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

Date of Government Version: 03/11/2014  
Date Data Arrived at EDR: 03/13/2014  
Date Made Active in Reports: 04/09/2014  
Number of Days to Update: 27

Source: Environmental Protection Agency  
Telephone: 312-886-6186  
Last EDR Contact: 03/13/2014  
Next Scheduled EDR Contact: 07/14/2014  
Data Release Frequency: Quarterly

### ***Federal RCRA generators list***

#### **RCRA-LQG: RCRA - Large Quantity Generators**

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.

Date of Government Version: 03/11/2014  
Date Data Arrived at EDR: 03/13/2014  
Date Made Active in Reports: 04/09/2014  
Number of Days to Update: 27

Source: Environmental Protection Agency  
Telephone: 312-886-6186  
Last EDR Contact: 03/13/2014  
Next Scheduled EDR Contact: 07/14/2014  
Data Release Frequency: Quarterly

#### **RCRA-SQG: RCRA - Small Quantity Generators**

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month.

Date of Government Version: 03/11/2014  
Date Data Arrived at EDR: 03/13/2014  
Date Made Active in Reports: 04/09/2014  
Number of Days to Update: 27

Source: Environmental Protection Agency  
Telephone: 312-886-6186  
Last EDR Contact: 03/13/2014  
Next Scheduled EDR Contact: 07/14/2014  
Data Release Frequency: Quarterly

#### **RCRA-CESQG: RCRA - Conditionally Exempt Small Quantity Generators**

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month.

Date of Government Version: 03/11/2014  
Date Data Arrived at EDR: 03/13/2014  
Date Made Active in Reports: 04/09/2014  
Number of Days to Update: 27

Source: Environmental Protection Agency  
Telephone: 312-886-6186  
Last EDR Contact: 03/13/2014  
Next Scheduled EDR Contact: 07/14/2014  
Data Release Frequency: Varies

# GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

## ***Federal institutional controls / engineering controls registries***

### **US ENG CONTROLS: Engineering Controls Sites List**

A listing of sites with engineering controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health.

Date of Government Version: 12/17/2013	Source: Environmental Protection Agency
Date Data Arrived at EDR: 01/14/2014	Telephone: 703-603-0695
Date Made Active in Reports: 01/28/2014	Last EDR Contact: 06/05/2014
Number of Days to Update: 14	Next Scheduled EDR Contact: 09/22/2014
	Data Release Frequency: Varies

### **US INST CONTROL: Sites with Institutional Controls**

A listing of sites with institutional controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls.

Date of Government Version: 12/17/2013	Source: Environmental Protection Agency
Date Data Arrived at EDR: 01/14/2014	Telephone: 703-603-0695
Date Made Active in Reports: 01/28/2014	Last EDR Contact: 06/05/2014
Number of Days to Update: 14	Next Scheduled EDR Contact: 09/22/2014
	Data Release Frequency: Varies

### **LUCIS: Land Use Control Information System**

LUCIS contains records of land use control information pertaining to the former Navy Base Realignment and Closure properties.

Date of Government Version: 02/26/2014	Source: Department of the Navy
Date Data Arrived at EDR: 02/28/2014	Telephone: 843-820-7326
Date Made Active in Reports: 04/24/2014	Last EDR Contact: 05/19/2014
Number of Days to Update: 55	Next Scheduled EDR Contact: 09/01/2014
	Data Release Frequency: Varies

## ***Federal ERNS list***

### **ERNS: Emergency Response Notification System**

Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 09/30/2013	Source: National Response Center, United States Coast Guard
Date Data Arrived at EDR: 10/01/2013	Telephone: 202-267-2180
Date Made Active in Reports: 12/06/2013	Last EDR Contact: 06/06/2014
Number of Days to Update: 66	Next Scheduled EDR Contact: 07/14/2014
	Data Release Frequency: Annually

## ***State- and tribal - equivalent CERCLIS***

### **SHWS: This state does not maintain a SHWS list. See the Federal CERCLIS list and Federal NPL list.**

State Hazardous Waste Sites. State hazardous waste site records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. Available information varies by state.

Date of Government Version: N/A	Source: Ohio EPA
Date Data Arrived at EDR: N/A	Telephone: 614-644-2924
Date Made Active in Reports: N/A	Last EDR Contact: 05/07/2014
Number of Days to Update: N/A	Next Scheduled EDR Contact: 08/25/2014
	Data Release Frequency: N/A

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

### DERR: Division of Emergency & Remedial Response's Database

The DERR listings contains sites from all of Ohio that are in the Division of Environmental Response and Revitalization (DERR) database, which is an index of sites for which our district offices maintain files. The database is NOT a record of contaminated sites or sites suspected of contamination. Not all sites in the database are contaminated, and a site's absence from the database does not imply that it is uncontaminated.

Date of Government Version: 01/09/2014	Source: Ohio EPA
Date Data Arrived at EDR: 01/10/2014	Telephone: 614-644-3538
Date Made Active in Reports: 02/18/2014	Last EDR Contact: 05/27/2014
Number of Days to Update: 39	Next Scheduled EDR Contact: 08/25/2014
	Data Release Frequency: Semi-Annually

### ***State and tribal landfill and/or solid waste disposal site lists***

#### SWF/LF: Licensed Solid Waste Facilities

Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

Date of Government Version: 02/28/2014	Source: Ohio Environmental Protection Agency
Date Data Arrived at EDR: 04/25/2014	Telephone: 614-644-2621
Date Made Active in Reports: 05/27/2014	Last EDR Contact: 04/14/2014
Number of Days to Update: 32	Next Scheduled EDR Contact: 07/28/2014
	Data Release Frequency: Annually

### ***State and tribal leaking storage tank lists***

#### LUST: Leaking Underground Storage Tank File

Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

Date of Government Version: 02/16/2014	Source: Department of Commerce
Date Data Arrived at EDR: 02/19/2014	Telephone: 614-752-8200
Date Made Active in Reports: 03/26/2014	Last EDR Contact: 05/22/2014
Number of Days to Update: 35	Next Scheduled EDR Contact: 09/01/2014
	Data Release Frequency: Quarterly

#### UNREG LTANKS: Ohio Leaking UST File

A suspected or confirmed release of petroleum from a non-regulated UST.

Date of Government Version: 08/25/1999	Source: Department of Commerce
Date Data Arrived at EDR: 08/19/2003	Telephone: 614-752-7938
Date Made Active in Reports: 08/26/2003	Last EDR Contact: 08/01/2003
Number of Days to Update: 7	Next Scheduled EDR Contact: N/A
	Data Release Frequency: No Update Planned

#### INDIAN LUST R5: Leaking Underground Storage Tanks on Indian Land

Leaking underground storage tanks located on Indian Land in Michigan, Minnesota and Wisconsin.

Date of Government Version: 02/13/2014	Source: EPA, Region 5
Date Data Arrived at EDR: 02/14/2014	Telephone: 312-886-7439
Date Made Active in Reports: 02/24/2014	Last EDR Contact: 04/28/2014
Number of Days to Update: 10	Next Scheduled EDR Contact: 08/11/2014
	Data Release Frequency: Varies

#### INDIAN LUST R4: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Florida, Mississippi and North Carolina.



## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 11/21/2013  
Date Data Arrived at EDR: 11/26/2013  
Date Made Active in Reports: 02/24/2014  
Number of Days to Update: 90

Source: EPA Region 4  
Telephone: 404-562-8677  
Last EDR Contact: 04/22/2014  
Next Scheduled EDR Contact: 08/11/2014  
Data Release Frequency: Semi-Annually

INDIAN LUST R10: Leaking Underground Storage Tanks on Indian Land  
LUSTs on Indian land in Alaska, Idaho, Oregon and Washington.

Date of Government Version: 11/06/2013  
Date Data Arrived at EDR: 11/07/2013  
Date Made Active in Reports: 12/06/2013  
Number of Days to Update: 29

Source: EPA Region 10  
Telephone: 206-553-2857  
Last EDR Contact: 04/28/2014  
Next Scheduled EDR Contact: 08/11/2014  
Data Release Frequency: Quarterly

INDIAN LUST R9: Leaking Underground Storage Tanks on Indian Land  
LUSTs on Indian land in Arizona, California, New Mexico and Nevada

Date of Government Version: 03/01/2013  
Date Data Arrived at EDR: 03/01/2013  
Date Made Active in Reports: 04/12/2013  
Number of Days to Update: 42

Source: Environmental Protection Agency  
Telephone: 415-972-3372  
Last EDR Contact: 04/28/2014  
Next Scheduled EDR Contact: 08/11/2014  
Data Release Frequency: Quarterly

INDIAN LUST R8: Leaking Underground Storage Tanks on Indian Land  
LUSTs on Indian land in Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming.

Date of Government Version: 08/27/2012  
Date Data Arrived at EDR: 08/28/2012  
Date Made Active in Reports: 10/16/2012  
Number of Days to Update: 49

Source: EPA Region 8  
Telephone: 303-312-6271  
Last EDR Contact: 04/28/2014  
Next Scheduled EDR Contact: 08/11/2014  
Data Release Frequency: Quarterly

INDIAN LUST R7: Leaking Underground Storage Tanks on Indian Land  
LUSTs on Indian land in Iowa, Kansas, and Nebraska

Date of Government Version: 02/20/2014  
Date Data Arrived at EDR: 02/21/2014  
Date Made Active in Reports: 04/24/2014  
Number of Days to Update: 62

Source: EPA Region 7  
Telephone: 913-551-7003  
Last EDR Contact: 04/28/2014  
Next Scheduled EDR Contact: 08/11/2014  
Data Release Frequency: Varies

INDIAN LUST R6: Leaking Underground Storage Tanks on Indian Land  
LUSTs on Indian land in New Mexico and Oklahoma.

Date of Government Version: 09/12/2011  
Date Data Arrived at EDR: 09/13/2011  
Date Made Active in Reports: 11/11/2011  
Number of Days to Update: 59

Source: EPA Region 6  
Telephone: 214-665-6597  
Last EDR Contact: 02/21/2014  
Next Scheduled EDR Contact: 05/12/2014  
Data Release Frequency: Varies

INDIAN LUST R1: Leaking Underground Storage Tanks on Indian Land  
A listing of leaking underground storage tank locations on Indian Land.

Date of Government Version: 02/01/2013  
Date Data Arrived at EDR: 05/01/2013  
Date Made Active in Reports: 11/01/2013  
Number of Days to Update: 184

Source: EPA Region 1  
Telephone: 617-918-1313  
Last EDR Contact: 05/02/2014  
Next Scheduled EDR Contact: 08/11/2014  
Data Release Frequency: Varies

***State and tribal registered storage tank lists***

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

### UST: Underground Storage Tank File

Registered Underground Storage Tanks. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Date of Government Version: 05/18/2014	Source: Department of Commerce
Date Data Arrived at EDR: 05/22/2014	Telephone: 614-752-8200
Date Made Active in Reports: 06/16/2014	Last EDR Contact: 05/22/2014
Number of Days to Update: 25	Next Scheduled EDR Contact: 09/01/2014
	Data Release Frequency: Quarterly

### INDIAN UST R8: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 8 (Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming and 27 Tribal Nations).

Date of Government Version: 07/29/2013	Source: EPA Region 8
Date Data Arrived at EDR: 08/01/2013	Telephone: 303-312-6137
Date Made Active in Reports: 11/01/2013	Last EDR Contact: 04/28/2014
Number of Days to Update: 92	Next Scheduled EDR Contact: 08/11/2014
	Data Release Frequency: Quarterly

### INDIAN UST R6: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 6 (Louisiana, Arkansas, Oklahoma, New Mexico, Texas and 65 Tribes).

Date of Government Version: 01/29/2014	Source: EPA Region 6
Date Data Arrived at EDR: 01/29/2014	Telephone: 214-665-7591
Date Made Active in Reports: 03/12/2014	Last EDR Contact: 01/27/2014
Number of Days to Update: 42	Next Scheduled EDR Contact: 05/12/2014
	Data Release Frequency: Semi-Annually

### INDIAN UST R5: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 5 (Michigan, Minnesota and Wisconsin and Tribal Nations).

Date of Government Version: 02/13/2014	Source: EPA Region 5
Date Data Arrived at EDR: 02/14/2014	Telephone: 312-886-6136
Date Made Active in Reports: 02/24/2014	Last EDR Contact: 04/28/2014
Number of Days to Update: 10	Next Scheduled EDR Contact: 08/11/2014
	Data Release Frequency: Varies

### INDIAN UST R10: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 10 (Alaska, Idaho, Oregon, Washington, and Tribal Nations).

Date of Government Version: 02/05/2013	Source: EPA Region 10
Date Data Arrived at EDR: 02/06/2013	Telephone: 206-553-2857
Date Made Active in Reports: 04/12/2013	Last EDR Contact: 04/28/2014
Number of Days to Update: 65	Next Scheduled EDR Contact: 08/11/2014
	Data Release Frequency: Quarterly

### INDIAN UST R7: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 7 (Iowa, Kansas, Missouri, Nebraska, and 9 Tribal Nations).

Date of Government Version: 02/20/2014	Source: EPA Region 7
Date Data Arrived at EDR: 02/21/2014	Telephone: 913-551-7003
Date Made Active in Reports: 04/24/2014	Last EDR Contact: 04/28/2014
Number of Days to Update: 62	Next Scheduled EDR Contact: 08/11/2014
	Data Release Frequency: Varies

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

### INDIAN UST R9: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 9 (Arizona, California, Hawaii, Nevada, the Pacific Islands, and Tribal Nations).

Date of Government Version: 07/29/2013	Source: EPA Region 9
Date Data Arrived at EDR: 07/30/2013	Telephone: 415-972-3368
Date Made Active in Reports: 12/06/2013	Last EDR Contact: 04/28/2014
Number of Days to Update: 129	Next Scheduled EDR Contact: 08/11/2014
	Data Release Frequency: Quarterly

### INDIAN UST R1: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 1 (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont and ten Tribal Nations).

Date of Government Version: 02/01/2013	Source: EPA, Region 1
Date Data Arrived at EDR: 05/01/2013	Telephone: 617-918-1313
Date Made Active in Reports: 01/27/2014	Last EDR Contact: 05/02/2014
Number of Days to Update: 271	Next Scheduled EDR Contact: 08/11/2014
	Data Release Frequency: Varies

### INDIAN UST R4: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 4 (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee and Tribal Nations)

Date of Government Version: 11/21/2013	Source: EPA Region 4
Date Data Arrived at EDR: 11/26/2013	Telephone: 404-562-9424
Date Made Active in Reports: 02/24/2014	Last EDR Contact: 04/22/2014
Number of Days to Update: 90	Next Scheduled EDR Contact: 08/11/2014
	Data Release Frequency: Semi-Annually

### FEMA UST: Underground Storage Tank Listing

A listing of all FEMA owned underground storage tanks.

Date of Government Version: 01/01/2010	Source: FEMA
Date Data Arrived at EDR: 02/16/2010	Telephone: 202-646-5797
Date Made Active in Reports: 04/12/2010	Last EDR Contact: 04/15/2014
Number of Days to Update: 55	Next Scheduled EDR Contact: 07/28/2014
	Data Release Frequency: Varies

### ***State and tribal institutional control / engineering control registries***

#### ENG CONTROLS: Sites with Engineering Controls

A database that tracks properties with engineering controls.

Date of Government Version: 01/09/2014	Source: Ohio EPA
Date Data Arrived at EDR: 01/10/2014	Telephone: 614-644-2306
Date Made Active in Reports: 02/18/2014	Last EDR Contact: 05/27/2014
Number of Days to Update: 39	Next Scheduled EDR Contact: 08/25/2014
	Data Release Frequency: Semi-Annually

#### INST CONTROL: Sites with Institutional Engineering Controls

A database that tracks properties with institutional controls.

Date of Government Version: 01/09/2014	Source: Ohio Environmental Protection Agency
Date Data Arrived at EDR: 01/10/2014	Telephone: 614-644-2306
Date Made Active in Reports: 02/18/2014	Last EDR Contact: 05/27/2014
Number of Days to Update: 39	Next Scheduled EDR Contact: 08/25/2014
	Data Release Frequency: Semi-Annually

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

### HIST INST CONTROLS: Institutional Controls Database

"Institutional control" is a restriction that is recorded in the same manner as a deed which limits access to or use of the property such that exposure to hazardous substances or petroleum are effectively and reliably eliminated or mitigated. Examples of institutional controls include land and water use restrictions. This database is no longer updated or maintained by the state agency.

Date of Government Version: 05/10/2005  
Date Data Arrived at EDR: 04/06/2006  
Date Made Active in Reports: 05/04/2006  
Number of Days to Update: 28

Source: Ohio EPA  
Telephone: 614-644-2306  
Last EDR Contact: 06/02/2008  
Next Scheduled EDR Contact: 09/01/2008  
Data Release Frequency: No Update Planned

### HIST ENG CONTROLS: Operation & Maintenance Agreements Database

Volunteers that complete a voluntary action that relies on the ongoing operation and maintenance (O&M) of an engineered control to make the site protective (e.g" cap systems and ground water treatment systems) must enter into a legally binding agreement with the Ohio EPA before the director issues a covenant not to sue. This O&M Agreement must describe how the remedy is constructed and how it will be monitored, maintained and repaired. It also lays out inspection opportunities for the agency. Companies must document that they have the financial capability to operate any remedy relied on, before the agency will agree to enter into the O&M Agreement. The statute requires that the agency be notified of any change in ownership. This database is no longer updated or maintained by the state agency.

Date of Government Version: 05/10/2005  
Date Data Arrived at EDR: 04/04/2006  
Date Made Active in Reports: 05/04/2006  
Number of Days to Update: 30

Source: Ohio EPA  
Telephone: 614-644-2306  
Last EDR Contact: 06/02/2008  
Next Scheduled EDR Contact: 09/01/2008  
Data Release Frequency: No Update Planned

### ***State and tribal voluntary cleanup sites***

#### INDIAN VCP R1: Voluntary Cleanup Priority Listing

A listing of voluntary cleanup priority sites located on Indian Land located in Region 1.

Date of Government Version: 09/17/2013  
Date Data Arrived at EDR: 10/01/2013  
Date Made Active in Reports: 12/06/2013  
Number of Days to Update: 66

Source: EPA, Region 1  
Telephone: 617-918-1102  
Last EDR Contact: 04/01/2014  
Next Scheduled EDR Contact: 07/14/2014  
Data Release Frequency: Varies

#### INDIAN VCP R7: Voluntary Cleanup Priority Listing

A listing of voluntary cleanup priority sites located on Indian Land located in Region 7.

Date of Government Version: 03/20/2008  
Date Data Arrived at EDR: 04/22/2008  
Date Made Active in Reports: 05/19/2008  
Number of Days to Update: 27

Source: EPA, Region 7  
Telephone: 913-551-7365  
Last EDR Contact: 04/20/2009  
Next Scheduled EDR Contact: 07/20/2009  
Data Release Frequency: Varies

#### VCP: Voluntary Action Program Sites

Site involved in the Voluntary Action Program.

Date of Government Version: 03/31/2014  
Date Data Arrived at EDR: 01/10/2014  
Date Made Active in Reports: 02/18/2014  
Number of Days to Update: 39

Source: Ohio EPA, Voluntary Action Program  
Telephone: 614-728-1298  
Last EDR Contact: 05/27/2014  
Next Scheduled EDR Contact: 08/25/2014  
Data Release Frequency: Semi-Annually

### ***State and tribal Brownfields sites***

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

### BROWNFIELDS: Ohio Brownfield Inventory

A statewide brownfields inventory. A brownfield is an abandoned, idled or under-used industrial or commercial property where expansion or redevelopment is complicated by known or potential releases of hazardous substances and/or petroleum.

Date of Government Version: 03/21/2014  
Date Data Arrived at EDR: 03/21/2014  
Date Made Active in Reports: 04/23/2014  
Number of Days to Update: 33

Source: Ohio EPA  
Telephone: 614-644-3748  
Last EDR Contact: 03/21/2014  
Next Scheduled EDR Contact: 06/30/2014  
Data Release Frequency: Varies

### ADDITIONAL ENVIRONMENTAL RECORDS

#### ***Local Brownfield lists***

##### US BROWNFIELDS: A Listing of Brownfields Sites

Brownfields are real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Cleaning up and reinvesting in these properties takes development pressures off of undeveloped, open land, and both improves and protects the environment. Assessment, Cleanup and Redevelopment Exchange System (ACRES) stores information reported by EPA Brownfields grant recipients on brownfields properties assessed or cleaned up with grant funding as well as information on Targeted Brownfields Assessments performed by EPA Regions. A listing of ACRES Brownfield sites is obtained from Cleanups in My Community. Cleanups in My Community provides information on Brownfields properties for which information is reported back to EPA, as well as areas served by Brownfields grant programs.

Date of Government Version: 03/20/2014  
Date Data Arrived at EDR: 03/20/2014  
Date Made Active in Reports: 04/09/2014  
Number of Days to Update: 20

Source: Environmental Protection Agency  
Telephone: 202-566-2777  
Last EDR Contact: 03/20/2014  
Next Scheduled EDR Contact: 07/07/2014  
Data Release Frequency: Semi-Annually

#### ***Local Lists of Landfill / Solid Waste Disposal Sites***

##### ODI: Open Dump Inventory

An open dump is defined as a disposal facility that does not comply with one or more of the Part 257 or Part 258 Subtitle D Criteria.

Date of Government Version: 06/30/1985  
Date Data Arrived at EDR: 08/09/2004  
Date Made Active in Reports: 09/17/2004  
Number of Days to Update: 39

Source: Environmental Protection Agency  
Telephone: 800-424-9346  
Last EDR Contact: 06/09/2004  
Next Scheduled EDR Contact: N/A  
Data Release Frequency: No Update Planned

##### DEBRIS REGION 9: Torres Martinez Reservation Illegal Dump Site Locations

A listing of illegal dump sites location on the Torres Martinez Indian Reservation located in eastern Riverside County and northern Imperial County, California.

Date of Government Version: 01/12/2009  
Date Data Arrived at EDR: 05/07/2009  
Date Made Active in Reports: 09/21/2009  
Number of Days to Update: 137

Source: EPA, Region 9  
Telephone: 415-947-4219  
Last EDR Contact: 04/28/2014  
Next Scheduled EDR Contact: 08/11/2014  
Data Release Frequency: No Update Planned

##### SWRCY: Recycling Facility Listing

A listing of recycling facility locations.

Date of Government Version: 01/13/2014  
Date Data Arrived at EDR: 03/28/2014  
Date Made Active in Reports: 04/25/2014  
Number of Days to Update: 28

Source: Ohio EPA  
Telephone: 614-728-5357  
Last EDR Contact: 04/28/2014  
Next Scheduled EDR Contact: 07/28/2014  
Data Release Frequency: Varies

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

### HIST LF: Old Solid Waste Landfill

A list of about 1200 old abandoned dumps or landfills. This database was developed from Ohio EPA staff notebooks and other information dating from the mid-1970s

Date of Government Version: 01/01/1980  
Date Data Arrived at EDR: 07/01/2003  
Date Made Active in Reports: 07/17/2003  
Number of Days to Update: 16

Source: Ohio EPA  
Telephone: 614-644-3749  
Last EDR Contact: 06/26/2003  
Next Scheduled EDR Contact: N/A  
Data Release Frequency: No Update Planned

### INDIAN ODI: Report on the Status of Open Dumps on Indian Lands

Location of open dumps on Indian land.

Date of Government Version: 12/31/1998  
Date Data Arrived at EDR: 12/03/2007  
Date Made Active in Reports: 01/24/2008  
Number of Days to Update: 52

Source: Environmental Protection Agency  
Telephone: 703-308-8245  
Last EDR Contact: 05/02/2014  
Next Scheduled EDR Contact: 08/18/2014  
Data Release Frequency: Varies

### **Local Lists of Hazardous waste / Contaminated Sites**

#### US CDL: Clandestine Drug Labs

A listing of clandestine drug lab locations. The U.S. Department of Justice ("the Department") provides this web site as a public service. It contains addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the Department, and the Department has not verified the entry and does not guarantee its accuracy. Members of the public must verify the accuracy of all entries by, for example, contacting local law enforcement and local health departments.

Date of Government Version: 12/04/2013  
Date Data Arrived at EDR: 12/10/2013  
Date Made Active in Reports: 02/13/2014  
Number of Days to Update: 65

Source: Drug Enforcement Administration  
Telephone: 202-307-1000  
Last EDR Contact: 06/04/2014  
Next Scheduled EDR Contact: 09/15/2014  
Data Release Frequency: Quarterly

#### CDL: Clandestine Drug Lab Locations

A list of clandestine drug lab sites with environmental impact. This list is extracted from the SPILLS database based on the "product" type.

Date of Government Version: 03/06/2014  
Date Data Arrived at EDR: 03/07/2014  
Date Made Active in Reports: 03/26/2014  
Number of Days to Update: 19

Source: Ohio EPA  
Telephone: 614-644-2080  
Last EDR Contact: 05/12/2014  
Next Scheduled EDR Contact: 08/25/2014  
Data Release Frequency: Varies

#### US HIST CDL: National Clandestine Laboratory Register

A listing of clandestine drug lab locations. The U.S. Department of Justice ("the Department") provides this web site as a public service. It contains addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the Department, and the Department has not verified the entry and does not guarantee its accuracy. Members of the public must verify the accuracy of all entries by, for example, contacting local law enforcement and local health departments.

Date of Government Version: 09/01/2007  
Date Data Arrived at EDR: 11/19/2008  
Date Made Active in Reports: 03/30/2009  
Number of Days to Update: 131

Source: Drug Enforcement Administration  
Telephone: 202-307-1000  
Last EDR Contact: 06/04/2014  
Next Scheduled EDR Contact: 09/15/2014  
Data Release Frequency: No Update Planned

### **Local Lists of Registered Storage Tanks**

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

### ARCHIVE UST: Archived Underground Storage Tank Sites

Underground storage tank records that have been removed from the Underground Storage Tank database.

Date of Government Version: 05/18/2014

Date Data Arrived at EDR: 05/22/2014

Date Made Active in Reports: 06/16/2014

Number of Days to Update: 25

Source: Department of Commerce, Division of State Fire Marshal

Telephone: 614-752-7938

Last EDR Contact: 05/22/2014

Next Scheduled EDR Contact: 09/01/2014

Data Release Frequency: Quarterly

### Local Land Records

#### LIENS 2: CERCLA Lien Information

A Federal CERCLA ('Superfund') lien can exist by operation of law at any site or property at which EPA has spent Superfund monies. These monies are spent to investigate and address releases and threatened releases of contamination. CERCLIS provides information as to the identity of these sites and properties.

Date of Government Version: 02/18/2014

Date Data Arrived at EDR: 03/18/2014

Date Made Active in Reports: 04/24/2014

Number of Days to Update: 37

Source: Environmental Protection Agency

Telephone: 202-564-6023

Last EDR Contact: 04/28/2014

Next Scheduled EDR Contact: 08/11/2014

Data Release Frequency: Varies

### Records of Emergency Release Reports

#### HMIRS: Hazardous Materials Information Reporting System

Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version: 12/31/2013

Date Data Arrived at EDR: 01/03/2014

Date Made Active in Reports: 02/24/2014

Number of Days to Update: 52

Source: U.S. Department of Transportation

Telephone: 202-366-4555

Last EDR Contact: 04/01/2014

Next Scheduled EDR Contact: 07/14/2014

Data Release Frequency: Annually

#### SPILLS: Emergency Response Database

Incidents reported to the Emergency Response Unit. The focus of the ER program is to minimize the impact on the environment from accidental releases, spills, and unauthorized discharges from any fixed or mobile sources. Incidents involving petroleum products, hazardous materials, hazardous waste, abandoned drums, or other materials which may pose as a pollution threat to the state's water, land, or air should be reported immediately. Not all incidents included in the database are actual SPILLS, they can simply be reported incidents.

Date of Government Version: 03/06/2014

Date Data Arrived at EDR: 03/07/2014

Date Made Active in Reports: 03/26/2014

Number of Days to Update: 19

Source: Ohio EPA

Telephone: 614-644-2084

Last EDR Contact: 05/12/2014

Next Scheduled EDR Contact: 08/25/2014

Data Release Frequency: Varies

#### SPILLS 80: SPILLS80 data from FirstSearch

Spills 80 includes those spill and release records available from FirstSearch databases prior to 1990. Typically, they may include chemical, oil and/or hazardous substance spills recorded before 1990. Duplicate records that are already included in EDR incident and release records are not included in Spills 80.

Date of Government Version: 04/24/2004

Date Data Arrived at EDR: 01/03/2013

Date Made Active in Reports: 03/01/2013

Number of Days to Update: 57

Source: FirstSearch

Telephone: N/A

Last EDR Contact: 01/03/2013

Next Scheduled EDR Contact: N/A

Data Release Frequency: No Update Planned

#### SPILLS 90: SPILLS90 data from FirstSearch

Spills 90 includes those spill and release records available exclusively from FirstSearch databases. Typically, they may include chemical, oil and/or hazardous substance spills recorded after 1990. Duplicate records that are already included in EDR incident and release records are not included in Spills 90.



## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 09/13/2012  
Date Data Arrived at EDR: 01/03/2013  
Date Made Active in Reports: 02/27/2013  
Number of Days to Update: 55

Source: FirstSearch  
Telephone: N/A  
Last EDR Contact: 01/03/2013  
Next Scheduled EDR Contact: N/A  
Data Release Frequency: No Update Planned

### ***Other Ascertainable Records***

#### **RCRA NonGen / NLR: RCRA - Non Generators**

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

Date of Government Version: 03/11/2014  
Date Data Arrived at EDR: 03/13/2014  
Date Made Active in Reports: 04/09/2014  
Number of Days to Update: 27

Source: Environmental Protection Agency  
Telephone: 312-886-6186  
Last EDR Contact: 03/13/2014  
Next Scheduled EDR Contact: 07/14/2014  
Data Release Frequency: Varies

#### **DOT OPS: Incident and Accident Data**

Department of Transportation, Office of Pipeline Safety Incident and Accident data.

Date of Government Version: 07/31/2012  
Date Data Arrived at EDR: 08/07/2012  
Date Made Active in Reports: 09/18/2012  
Number of Days to Update: 42

Source: Department of Transportation, Office of Pipeline Safety  
Telephone: 202-366-4595  
Last EDR Contact: 05/06/2014  
Next Scheduled EDR Contact: 08/18/2014  
Data Release Frequency: Varies

#### **DOD: Department of Defense Sites**

This data set consists of federally owned or administered lands, administered by the Department of Defense, that have any area equal to or greater than 640 acres of the United States, Puerto Rico, and the U.S. Virgin Islands.

Date of Government Version: 12/31/2005  
Date Data Arrived at EDR: 11/10/2006  
Date Made Active in Reports: 01/11/2007  
Number of Days to Update: 62

Source: USGS  
Telephone: 888-275-8747  
Last EDR Contact: 04/18/2014  
Next Scheduled EDR Contact: 07/28/2014  
Data Release Frequency: Semi-Annually

#### **FUDS: Formerly Used Defense Sites**

The listing includes locations of Formerly Used Defense Sites properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions.

Date of Government Version: 12/31/2012  
Date Data Arrived at EDR: 02/28/2014  
Date Made Active in Reports: 04/24/2014  
Number of Days to Update: 55

Source: U.S. Army Corps of Engineers  
Telephone: 202-528-4285  
Last EDR Contact: 06/04/2014  
Next Scheduled EDR Contact: 09/22/2014  
Data Release Frequency: Varies

#### **CONSENT: Superfund (CERCLA) Consent Decrees**

Major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. Released periodically by United States District Courts after settlement by parties to litigation matters.

Date of Government Version: 12/31/2013  
Date Data Arrived at EDR: 01/24/2014  
Date Made Active in Reports: 02/24/2014  
Number of Days to Update: 31

Source: Department of Justice, Consent Decree Library  
Telephone: Varies  
Last EDR Contact: 06/13/2014  
Next Scheduled EDR Contact: 07/14/2014  
Data Release Frequency: Varies

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

### ROD: Records Of Decision

Record of Decision. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

Date of Government Version: 11/25/2013  
Date Data Arrived at EDR: 12/12/2013  
Date Made Active in Reports: 02/24/2014  
Number of Days to Update: 74

Source: EPA  
Telephone: 703-416-0223  
Last EDR Contact: 06/10/2014  
Next Scheduled EDR Contact: 09/22/2014  
Data Release Frequency: Annually

### UMTRA: Uranium Mill Tailings Sites

Uranium ore was mined by private companies for federal government use in national defense programs. When the mills shut down, large piles of the sand-like material (mill tailings) remain after uranium has been extracted from the ore. Levels of human exposure to radioactive materials from the piles are low; however, in some cases tailings were used as construction materials before the potential health hazards of the tailings were recognized.

Date of Government Version: 09/14/2010  
Date Data Arrived at EDR: 10/07/2011  
Date Made Active in Reports: 03/01/2012  
Number of Days to Update: 146

Source: Department of Energy  
Telephone: 505-845-0011  
Last EDR Contact: 02/25/2014  
Next Scheduled EDR Contact: 06/09/2014  
Data Release Frequency: Varies

### US MINES: Mines Master Index File

Contains all mine identification numbers issued for mines active or opened since 1971. The data also includes violation information.

Date of Government Version: 08/01/2013  
Date Data Arrived at EDR: 09/05/2013  
Date Made Active in Reports: 10/03/2013  
Number of Days to Update: 28

Source: Department of Labor, Mine Safety and Health Administration  
Telephone: 303-231-5959  
Last EDR Contact: 06/06/2014  
Next Scheduled EDR Contact: 09/15/2014  
Data Release Frequency: Semi-Annually

### TRIS: Toxic Chemical Release Inventory System

Toxic Release Inventory System. TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

Date of Government Version: 12/31/2011  
Date Data Arrived at EDR: 07/31/2013  
Date Made Active in Reports: 09/13/2013  
Number of Days to Update: 44

Source: EPA  
Telephone: 202-566-0250  
Last EDR Contact: 05/30/2014  
Next Scheduled EDR Contact: 09/08/2014  
Data Release Frequency: Annually

### TSCA: Toxic Substances Control Act

Toxic Substances Control Act. TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site.

Date of Government Version: 12/31/2006  
Date Data Arrived at EDR: 09/29/2010  
Date Made Active in Reports: 12/02/2010  
Number of Days to Update: 64

Source: EPA  
Telephone: 202-260-5521  
Last EDR Contact: 03/28/2014  
Next Scheduled EDR Contact: 07/07/2014  
Data Release Frequency: Every 4 Years

### FTTS: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act). To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 04/09/2009  
Date Data Arrived at EDR: 04/16/2009  
Date Made Active in Reports: 05/11/2009  
Number of Days to Update: 25

Source: EPA/Office of Prevention, Pesticides and Toxic Substances  
Telephone: 202-566-1667  
Last EDR Contact: 05/22/2014  
Next Scheduled EDR Contact: 09/08/2014  
Data Release Frequency: Quarterly

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

**FTTS INSP: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)**  
A listing of FIFRA/TSCA Tracking System (FTTS) inspections and enforcements.

Date of Government Version: 04/09/2009	Source: EPA
Date Data Arrived at EDR: 04/16/2009	Telephone: 202-566-1667
Date Made Active in Reports: 05/11/2009	Last EDR Contact: 05/22/2014
Number of Days to Update: 25	Next Scheduled EDR Contact: 09/08/2014
	Data Release Frequency: Quarterly

**HIST FTTS: FIFRA/TSCA Tracking System Administrative Case Listing**

A complete administrative case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

Date of Government Version: 10/19/2006	Source: Environmental Protection Agency
Date Data Arrived at EDR: 03/01/2007	Telephone: 202-564-2501
Date Made Active in Reports: 04/10/2007	Last EDR Contact: 12/17/2007
Number of Days to Update: 40	Next Scheduled EDR Contact: 03/17/2008
	Data Release Frequency: No Update Planned

**HIST FTTS INSP: FIFRA/TSCA Tracking System Inspection & Enforcement Case Listing**

A complete inspection and enforcement case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

Date of Government Version: 10/19/2006	Source: Environmental Protection Agency
Date Data Arrived at EDR: 03/01/2007	Telephone: 202-564-2501
Date Made Active in Reports: 04/10/2007	Last EDR Contact: 12/17/2008
Number of Days to Update: 40	Next Scheduled EDR Contact: 03/17/2008
	Data Release Frequency: No Update Planned

**SSTS: Section 7 Tracking Systems**

Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1st each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year.

Date of Government Version: 12/31/2009	Source: EPA
Date Data Arrived at EDR: 12/10/2010	Telephone: 202-564-4203
Date Made Active in Reports: 02/25/2011	Last EDR Contact: 04/29/2014
Number of Days to Update: 77	Next Scheduled EDR Contact: 08/11/2014
	Data Release Frequency: Annually

**ICIS: Integrated Compliance Information System**

The Integrated Compliance Information System (ICIS) supports the information needs of the national enforcement and compliance program as well as the unique needs of the National Pollutant Discharge Elimination System (NPDES) program.

Date of Government Version: 07/20/2011	Source: Environmental Protection Agency
Date Data Arrived at EDR: 11/10/2011	Telephone: 202-564-5088
Date Made Active in Reports: 01/10/2012	Last EDR Contact: 10/09/2014
Number of Days to Update: 61	Next Scheduled EDR Contact: 07/21/2014
	Data Release Frequency: Quarterly

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

### PADS: PCB Activity Database System

PCB Activity Database. PADS Identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities.

Date of Government Version: 06/01/2013	Source: EPA
Date Data Arrived at EDR: 07/17/2013	Telephone: 202-566-0500
Date Made Active in Reports: 11/01/2013	Last EDR Contact: 04/18/2014
Number of Days to Update: 107	Next Scheduled EDR Contact: 07/28/2014
	Data Release Frequency: Annually

### MLTS: Material Licensing Tracking System

MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 07/22/2013	Source: Nuclear Regulatory Commission
Date Data Arrived at EDR: 08/02/2013	Telephone: 301-415-7169
Date Made Active in Reports: 11/01/2013	Last EDR Contact: 06/05/2014
Number of Days to Update: 91	Next Scheduled EDR Contact: 09/22/2014
	Data Release Frequency: Quarterly

### RADINFO: Radiation Information Database

The Radiation Information Database (RADINFO) contains information about facilities that are regulated by U.S. Environmental Protection Agency (EPA) regulations for radiation and radioactivity.

Date of Government Version: 01/09/2014	Source: Environmental Protection Agency
Date Data Arrived at EDR: 01/10/2014	Telephone: 202-343-9775
Date Made Active in Reports: 03/12/2014	Last EDR Contact: 04/09/2014
Number of Days to Update: 61	Next Scheduled EDR Contact: 07/21/2014
	Data Release Frequency: Quarterly

### FINDS: Facility Index System/Facility Registry System

Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System).

Date of Government Version: 11/18/2013	Source: EPA
Date Data Arrived at EDR: 02/27/2014	Telephone: (312) 353-2000
Date Made Active in Reports: 03/12/2014	Last EDR Contact: 06/13/2014
Number of Days to Update: 13	Next Scheduled EDR Contact: 09/22/2014
	Data Release Frequency: Quarterly

### RAATS: RCRA Administrative Action Tracking System

RCRA Administration Action Tracking System. RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records. It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

Date of Government Version: 04/17/1995	Source: EPA
Date Data Arrived at EDR: 07/03/1995	Telephone: 202-564-4104
Date Made Active in Reports: 08/07/1995	Last EDR Contact: 06/02/2008
Number of Days to Update: 35	Next Scheduled EDR Contact: 09/01/2008
	Data Release Frequency: No Update Planned

### RMP: Risk Management Plans

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

When Congress passed the Clean Air Act Amendments of 1990, it required EPA to publish regulations and guidance for chemical accident prevention at facilities using extremely hazardous substances. The Risk Management Program Rule (RMP Rule) was written to implement Section 112(r) of these amendments. The rule, which built upon existing industry codes and standards, requires companies of all sizes that use certain flammable and toxic substances to develop a Risk Management Program, which includes a(n): Hazard assessment that details the potential effects of an accidental release, an accident history of the last five years, and an evaluation of worst-case and alternative accidental releases; Prevention program that includes safety precautions and maintenance, monitoring, and employee training measures; and Emergency response program that spells out emergency health care, employee training measures and procedures for informing the public and response agencies (e.g the fire department) should an accident occur.

Date of Government Version: 11/01/2013	Source: Environmental Protection Agency
Date Data Arrived at EDR: 12/12/2013	Telephone: 202-564-8600
Date Made Active in Reports: 02/13/2014	Last EDR Contact: 04/28/2014
Number of Days to Update: 63	Next Scheduled EDR Contact: 08/11/2014
	Data Release Frequency: Varies

### BRS: Biennial Reporting System

The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/31/2011	Source: EPA/NTIS
Date Data Arrived at EDR: 02/26/2013	Telephone: 800-424-9346
Date Made Active in Reports: 04/19/2013	Last EDR Contact: 05/30/2014
Number of Days to Update: 52	Next Scheduled EDR Contact: 09/08/2014
	Data Release Frequency: Biennially

### TOWNGAS: DERR Towngas Database

The database includes 82 very old sites (circa 1895) which produced gas from coal for street lighting. Most visual evidence of these sites has disappeared, however the potential for buried coal tar remains. The database is no longer in active use.

Date of Government Version: 07/28/1992	Source: Ohio EPA
Date Data Arrived at EDR: 02/21/2003	Telephone: 614-644-3749
Date Made Active in Reports: 03/05/2003	Last EDR Contact: 02/12/2003
Number of Days to Update: 12	Next Scheduled EDR Contact: N/A
	Data Release Frequency: No Update Planned

### UIC: Underground Injection Wells Listing

A listing of underground injection well locations.

Date of Government Version: 04/15/2014	Source: Ohio EPA
Date Data Arrived at EDR: 05/14/2014	Telephone: 614-644-2752
Date Made Active in Reports: 05/27/2014	Last EDR Contact: 05/14/2014
Number of Days to Update: 13	Next Scheduled EDR Contact: 08/25/2014
	Data Release Frequency: Varies

### DRYCLEANERS: Drycleaner Facility Listing

A listing of drycleaner facility locations.

Date of Government Version: 03/31/2014	Source: Ohio EPA
Date Data Arrived at EDR: 04/01/2014	Telephone: 614-644-3469
Date Made Active in Reports: 04/25/2014	Last EDR Contact: 03/31/2014
Number of Days to Update: 24	Next Scheduled EDR Contact: 07/14/2014
	Data Release Frequency: Varies

### NPDES: NPDES General Permit List

General information regarding NPDES (National Pollutant Discharge Elimination System) permits.

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 05/12/2014  
Date Data Arrived at EDR: 05/14/2014  
Date Made Active in Reports: 05/28/2014  
Number of Days to Update: 14

Source: Ohio EPA  
Telephone: 614-644-2031  
Last EDR Contact: 05/14/2014  
Next Scheduled EDR Contact: 08/25/2014  
Data Release Frequency: Semi-Annually

### AIRS: Title V Permits Listing

A listing of Title V Permits issued by the Division of Air Pollution Control. It is a federal operating permit program adopted and implemented by the state. The basic program elements typically specify that major sources will submit an operating application to the specified state environmental regulatory agency according to a schedule.

Date of Government Version: 03/27/2014  
Date Data Arrived at EDR: 03/28/2014  
Date Made Active in Reports: 04/25/2014  
Number of Days to Update: 28

Source: Ohio EPA  
Telephone: 614-644-2270  
Last EDR Contact: 03/24/2014  
Next Scheduled EDR Contact: 07/07/2014  
Data Release Frequency: Varies

### USD: Urban Setting Designation Sites

A USD may be requested for properties participating in the VAP when there is no current or future use of the ground water by local residents for drinking, showering, bathing or cooking. In these areas, an approved USD would lower the cost of cleanup and promote economic redevelopment while still protecting public health and safety. If these USDs were to be approved, the ground water cleanup or response requirements for the areas could be lessened. The Ohio EPA director may approve a USD request based on a demonstration that the USD requirements are met and an evaluation of existing and future uses of ground water in the area. The Ohio EPA director's decision on approval or denial of the request is needed before cleanup requirements for the site can be determined.

Date of Government Version: 01/09/2014  
Date Data Arrived at EDR: 01/10/2014  
Date Made Active in Reports: 02/18/2014  
Number of Days to Update: 39

Source: Ohio EPA  
Telephone: 614-644-3749  
Last EDR Contact: 05/27/2014  
Next Scheduled EDR Contact: 08/25/2014  
Data Release Frequency: Varies

### HIST USD: Urban Setting Designations Database

A USD may be requested for properties participating in the VAP when there is no current or future use of the ground water by local residents for drinking, showering, bathing or cooking. In these areas, an approved USD would lower the cost of cleanup and promote economic redevelopment while still protecting public health and safety. If these USDs were to be approved, the ground water cleanup or response requirements for the areas could be lessened. The Ohio EPA director may approve a USD request based on a demonstration that the USD requirements are met and an evaluation of existing and future uses of ground water in the area. The Ohio EPA director's decision on approval or denial of the request is needed before cleanup requirements for the site can be determined. This database is no longer updated or maintained by the state agency.

Date of Government Version: 05/10/2005  
Date Data Arrived at EDR: 04/25/2006  
Date Made Active in Reports: 05/11/2006  
Number of Days to Update: 16

Source: Ohio EPA  
Telephone: 614-644-3749  
Last EDR Contact: 06/02/2008  
Next Scheduled EDR Contact: 09/01/2008  
Data Release Frequency: No Update Planned

### INDIAN RESERV: Indian Reservations

This map layer portrays Indian administered lands of the United States that have any area equal to or greater than 640 acres.

Date of Government Version: 12/31/2005  
Date Data Arrived at EDR: 12/08/2006  
Date Made Active in Reports: 01/11/2007  
Number of Days to Update: 34

Source: USGS  
Telephone: 202-208-3710  
Last EDR Contact: 04/18/2014  
Next Scheduled EDR Contact: 07/28/2014  
Data Release Frequency: Semi-Annually

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

### SCRD DRYCLEANERS: State Coalition for Remediation of Drycleaners Listing

The State Coalition for Remediation of Drycleaners was established in 1998, with support from the U.S. EPA Office of Superfund Remediation and Technology Innovation. It is comprised of representatives of states with established drycleaner remediation programs. Currently the member states are Alabama, Connecticut, Florida, Illinois, Kansas, Minnesota, Missouri, North Carolina, Oregon, South Carolina, Tennessee, Texas, and Wisconsin.

Date of Government Version: 03/07/2011	Source: Environmental Protection Agency
Date Data Arrived at EDR: 03/09/2011	Telephone: 615-532-8599
Date Made Active in Reports: 05/02/2011	Last EDR Contact: 04/21/2014
Number of Days to Update: 54	Next Scheduled EDR Contact: 08/04/2014
	Data Release Frequency: Varies

### PRP: Potentially Responsible Parties

A listing of verified Potentially Responsible Parties

Date of Government Version: 04/15/2013	Source: EPA
Date Data Arrived at EDR: 07/03/2013	Telephone: 202-564-6023
Date Made Active in Reports: 09/13/2013	Last EDR Contact: 04/04/2014
Number of Days to Update: 72	Next Scheduled EDR Contact: 07/14/2014
	Data Release Frequency: Quarterly

### 2020 COR ACTION: 2020 Corrective Action Program List

The EPA has set ambitious goals for the RCRA Corrective Action program by creating the 2020 Corrective Action Universe. This RCRA cleanup baseline includes facilities expected to need corrective action. The 2020 universe contains a wide variety of sites. Some properties are heavily contaminated while others were contaminated but have since been cleaned up. Still others have not been fully investigated yet, and may require little or no remediation. Inclusion in the 2020 Universe does not necessarily imply failure on the part of a facility to meet its RCRA obligations.

Date of Government Version: 11/11/2011	Source: Environmental Protection Agency
Date Data Arrived at EDR: 05/18/2012	Telephone: 703-308-4044
Date Made Active in Reports: 05/25/2012	Last EDR Contact: 05/16/2014
Number of Days to Update: 7	Next Scheduled EDR Contact: 08/25/2014
	Data Release Frequency: Varies

### LEAD SMELTER 2: Lead Smelter Sites

A list of several hundred sites in the U.S. where secondary lead smelting was done from 1931 and 1964. These sites may pose a threat to public health through ingestion or inhalation of contaminated soil or dust

Date of Government Version: 04/05/2001	Source: American Journal of Public Health
Date Data Arrived at EDR: 10/27/2010	Telephone: 703-305-6451
Date Made Active in Reports: 12/02/2010	Last EDR Contact: 12/02/2009
Number of Days to Update: 36	Next Scheduled EDR Contact: N/A
	Data Release Frequency: No Update Planned

### LEAD SMELTER 1: Lead Smelter Sites

A listing of former lead smelter site locations.

Date of Government Version: 01/29/2013	Source: Environmental Protection Agency
Date Data Arrived at EDR: 02/14/2013	Telephone: 703-603-8787
Date Made Active in Reports: 02/27/2013	Last EDR Contact: 04/04/2014
Number of Days to Update: 13	Next Scheduled EDR Contact: 07/21/2014
	Data Release Frequency: Varies

### COAL ASH DOE: Steam-Electric Plant Operation Data

A listing of power plants that store ash in surface ponds.

Date of Government Version: 12/31/2005	Source: Department of Energy
Date Data Arrived at EDR: 08/07/2009	Telephone: 202-586-8719
Date Made Active in Reports: 10/22/2009	Last EDR Contact: 04/18/2014
Number of Days to Update: 76	Next Scheduled EDR Contact: 07/28/2014
	Data Release Frequency: Varies

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

### COAL ASH: Coal Ash Disposal Site Listing

A listing of coal ash disposal site locations.

Date of Government Version: 02/07/2012  
Date Data Arrived at EDR: 02/17/2012  
Date Made Active in Reports: 03/28/2012  
Number of Days to Update: 40

Source: Ohio EPA  
Telephone: 614-644-2134  
Last EDR Contact: 04/14/2014  
Next Scheduled EDR Contact: 07/28/2014  
Data Release Frequency: Varies

### EPA WATCH LIST: EPA WATCH LIST

EPA maintains a "Watch List" to facilitate dialogue between EPA, state and local environmental agencies on enforcement matters relating to facilities with alleged violations identified as either significant or high priority. Being on the Watch List does not mean that the facility has actually violated the law only that an investigation by EPA or a state or local environmental agency has led those organizations to allege that an unproven violation has in fact occurred. Being on the Watch List does not represent a higher level of concern regarding the alleged violations that were detected, but instead indicates cases requiring additional dialogue between EPA, state and local agencies - primarily because of the length of time the alleged violation has gone unaddressed or unresolved.

Date of Government Version: 06/30/2013  
Date Data Arrived at EDR: 08/13/2013  
Date Made Active in Reports: 09/13/2013  
Number of Days to Update: 31

Source: Environmental Protection Agency  
Telephone: 617-520-3000  
Last EDR Contact: 05/16/2014  
Next Scheduled EDR Contact: 08/25/2014  
Data Release Frequency: Quarterly

### CRO: Cessation of Regulated Operations Facility Listing

"Cessation of Regulated Operations" means the discontinuation or termination of regulated operations or the finalizing of any transaction or proceeding through which those operations are discontinued. "Regulated Operations" means the production, use, storage or handling of regulated substances.

Date of Government Version: 03/24/2014  
Date Data Arrived at EDR: 05/16/2014  
Date Made Active in Reports: 05/27/2014  
Number of Days to Update: 11

Source: Ohio EPA  
Telephone: 614-644-3065  
Last EDR Contact: 05/07/2014  
Next Scheduled EDR Contact: 08/25/2014  
Data Release Frequency: Varies

### PCB TRANSFORMER: PCB Transformer Registration Database

The database of PCB transformer registrations that includes all PCB registration submittals.

Date of Government Version: 02/01/2011  
Date Data Arrived at EDR: 10/19/2011  
Date Made Active in Reports: 01/10/2012  
Number of Days to Update: 83

Source: Environmental Protection Agency  
Telephone: 202-566-0517  
Last EDR Contact: 05/02/2014  
Next Scheduled EDR Contact: 08/11/2014  
Data Release Frequency: Varies

### COAL ASH EPA: Coal Combustion Residues Surface Impoundments List

A listing of coal combustion residues surface impoundments with high hazard potential ratings.

Date of Government Version: 08/17/2010  
Date Data Arrived at EDR: 01/03/2011  
Date Made Active in Reports: 03/21/2011  
Number of Days to Update: 77

Source: Environmental Protection Agency  
Telephone: N/A  
Last EDR Contact: 06/11/2014  
Next Scheduled EDR Contact: 09/22/2014  
Data Release Frequency: Varies

### Financial Assurance: Financial Assurance Information Listing

Financial assurance information.

Date of Government Version: 04/14/2014  
Date Data Arrived at EDR: 04/17/2014  
Date Made Active in Reports: 05/21/2014  
Number of Days to Update: 34

Source: Ohio EPA  
Telephone: 614-644-2955  
Last EDR Contact: 04/14/2014  
Next Scheduled EDR Contact: 07/28/2014  
Data Release Frequency: Varies



## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

### US FIN ASSUR: Financial Assurance Information

All owners and operators of facilities that treat, store, or dispose of hazardous waste are required to provide proof that they will have sufficient funds to pay for the clean up, closure, and post-closure care of their facilities.

Date of Government Version: 02/25/2014  
Date Data Arrived at EDR: 02/27/2014  
Date Made Active in Reports: 04/09/2014  
Number of Days to Update: 41

Source: Environmental Protection Agency  
Telephone: 202-566-1917  
Last EDR Contact: 05/16/2014  
Next Scheduled EDR Contact: 09/01/2014  
Data Release Frequency: Quarterly

### US AIRS MINOR: Air Facility System Data

A listing of minor source facilities.

Date of Government Version: 10/23/2013  
Date Data Arrived at EDR: 11/06/2013  
Date Made Active in Reports: 12/06/2013  
Number of Days to Update: 30

Source: EPA  
Telephone: 202-564-5962  
Last EDR Contact: 03/31/2014  
Next Scheduled EDR Contact: 07/14/2014  
Data Release Frequency: Annually

### FEDLAND: Federal and Indian Lands

Federally and Indian administrated lands of the United States. Lands included are administrated by: Army Corps of Engineers, Bureau of Reclamation, National Wild and Scenic River, National Wildlife Refuge, Public Domain Land, Wilderness, Wilderness Study Area, Wildlife Management Area, Bureau of Indian Affairs, Bureau of Land Management, Department of Justice, Forest Service, Fish and Wildlife Service, National Park Service.

Date of Government Version: 12/31/2005  
Date Data Arrived at EDR: 02/06/2006  
Date Made Active in Reports: 01/11/2007  
Number of Days to Update: 339

Source: U.S. Geological Survey  
Telephone: 888-275-8747  
Last EDR Contact: 04/18/2014  
Next Scheduled EDR Contact: 07/28/2014  
Data Release Frequency: N/A

### US AIRS (AFS): Aerometric Information Retrieval System Facility Subsystem (AFS)

The database is a sub-system of Aerometric Information Retrieval System (AIRS). AFS contains compliance data on air pollution point sources regulated by the U.S. EPA and/or state and local air regulatory agencies. This information comes from source reports by various stationary sources of air pollution, such as electric power plants, steel mills, factories, and universities, and provides information about the air pollutants they produce. Action, air program, air program pollutant, and general level plant data. It is used to track emissions and compliance data from industrial plants.

Date of Government Version: 10/23/2013  
Date Data Arrived at EDR: 11/06/2013  
Date Made Active in Reports: 12/06/2013  
Number of Days to Update: 30

Source: EPA  
Telephone: 202-564-5962  
Last EDR Contact: 03/31/2014  
Next Scheduled EDR Contact: 07/14/2014  
Data Release Frequency: Annually

## **EDR HIGH RISK HISTORICAL RECORDS**

### ***EDR Exclusive Records***

#### EDR MGP: EDR Proprietary Manufactured Gas Plants

The EDR Proprietary Manufactured Gas Plant Database includes records of coal gas plants (manufactured gas plants) compiled by EDR's researchers. Manufactured gas sites were used in the United States from the 1800's to 1950's to produce a gas that could be distributed and used as fuel. These plants used whale oil, rosin, coal, or a mixture of coal, oil, and water that also produced a significant amount of waste. Many of the byproducts of the gas production, such as coal tar (oily waste containing volatile and non-volatile chemicals), sludges, oils and other compounds are potentially hazardous to human health and the environment. The byproduct from this process was frequently disposed of directly at the plant site and can remain or spread slowly, serving as a continuous source of soil and groundwater contamination.

Date of Government Version: N/A  
Date Data Arrived at EDR: N/A  
Date Made Active in Reports: N/A  
Number of Days to Update: N/A

Source: EDR, Inc.  
Telephone: N/A  
Last EDR Contact: N/A  
Next Scheduled EDR Contact: N/A  
Data Release Frequency: No Update Planned

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

### EDR US Hist Auto Stat: EDR Exclusive Historic Gas Stations

EDR has searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

Date of Government Version: N/A	Source: EDR, Inc.
Date Data Arrived at EDR: N/A	Telephone: N/A
Date Made Active in Reports: N/A	Last EDR Contact: N/A
Number of Days to Update: N/A	Next Scheduled EDR Contact: N/A
	Data Release Frequency: Varies

### EDR US Hist Cleaners: EDR Exclusive Historic Dry Cleaners

EDR has searched selected national collections of business directories and has collected listings of potential dry cleaner sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include dry cleaning establishments. The categories reviewed included, but were not limited to dry cleaners, cleaners, laundry, laundromat, cleaning/laundry, wash & dry etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

Date of Government Version: N/A	Source: EDR, Inc.
Date Data Arrived at EDR: N/A	Telephone: N/A
Date Made Active in Reports: N/A	Last EDR Contact: N/A
Number of Days to Update: N/A	Next Scheduled EDR Contact: N/A
	Data Release Frequency: Varies

### EDR US Hist Cleaners: EDR Proprietary Historic Dry Cleaners - Cole

Date of Government Version: N/A	Source: N/A
Date Data Arrived at EDR: N/A	Telephone: N/A
Date Made Active in Reports: N/A	Last EDR Contact: N/A
Number of Days to Update: N/A	Next Scheduled EDR Contact: N/A
	Data Release Frequency: Varies

### EDR US Hist Auto Stat: EDR Proprietary Historic Gas Stations - Cole

Date of Government Version: N/A	Source: N/A
Date Data Arrived at EDR: N/A	Telephone: N/A
Date Made Active in Reports: N/A	Last EDR Contact: N/A
Number of Days to Update: N/A	Next Scheduled EDR Contact: N/A
	Data Release Frequency: Varies

## **EDR RECOVERED GOVERNMENT ARCHIVES**

### ***Exclusive Recovered Govt. Archives***

#### RGA LF: Recovered Government Archive Solid Waste Facilities List

The EDR Recovered Government Archive Landfill database provides a list of landfills derived from historical databases and includes many records that no longer appear in current government lists. Compiled from Records formerly available from the Ohio Environmental Protection Agency in Ohio.

Date of Government Version: N/A	Source: Ohio Environmental Protection Agency
Date Data Arrived at EDR: 07/01/2013	Telephone: N/A
Date Made Active in Reports: 01/13/2014	Last EDR Contact: 06/01/2012
Number of Days to Update: 196	Next Scheduled EDR Contact: N/A
	Data Release Frequency: Varies

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

### RGA LUST: Recovered Government Archive Leaking Underground Storage Tank

The EDR Recovered Government Archive Leaking Underground Storage Tank database provides a list of LUST incidents derived from historical databases and includes many records that no longer appear in current government lists. Compiled from Records formerly available from the Department of Commerce in Ohio.

Date of Government Version: N/A

Date Data Arrived at EDR: 07/01/2013

Date Made Active in Reports: 12/20/2013

Number of Days to Update: 172

Source: Department of Commerce

Telephone: N/A

Last EDR Contact: 06/01/2012

Next Scheduled EDR Contact: N/A

Data Release Frequency: Varies

### OTHER DATABASE(S)

Depending on the geographic area covered by this report, the data provided in these specialty databases may or may not be complete. For example, the existence of wetlands information data in a specific report does not mean that all wetlands in the area covered by the report are included. Moreover, the absence of any reported wetlands information does not necessarily mean that wetlands do not exist in the area covered by the report.

### CT MANIFEST: Hazardous Waste Manifest Data

Facility and manifest data. Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a tsd facility.

Date of Government Version: 07/30/2013

Date Data Arrived at EDR: 08/19/2013

Date Made Active in Reports: 10/03/2013

Number of Days to Update: 45

Source: Department of Energy & Environmental Protection

Telephone: 860-424-3375

Last EDR Contact: 05/23/2014

Next Scheduled EDR Contact: 09/01/2014

Data Release Frequency: Annually

### NJ MANIFEST: Manifest Information

Hazardous waste manifest information.

Date of Government Version: 12/31/2011

Date Data Arrived at EDR: 07/19/2012

Date Made Active in Reports: 08/28/2012

Number of Days to Update: 40

Source: Department of Environmental Protection

Telephone: N/A

Last EDR Contact: 04/18/2014

Next Scheduled EDR Contact: 07/28/2014

Data Release Frequency: Annually

### NY MANIFEST: Facility and Manifest Data

Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a TSD facility.

Date of Government Version: 05/01/2014

Date Data Arrived at EDR: 05/07/2014

Date Made Active in Reports: 06/10/2014

Number of Days to Update: 34

Source: Department of Environmental Conservation

Telephone: 518-402-8651

Last EDR Contact: 05/07/2014

Next Scheduled EDR Contact: 08/18/2014

Data Release Frequency: Annually

### PA MANIFEST: Manifest Information

Hazardous waste manifest information.

Date of Government Version: 12/31/2012

Date Data Arrived at EDR: 07/24/2013

Date Made Active in Reports: 08/19/2013

Number of Days to Update: 26

Source: Department of Environmental Protection

Telephone: 717-783-8990

Last EDR Contact: 04/21/2014

Next Scheduled EDR Contact: 08/04/2014

Data Release Frequency: Annually

### RI MANIFEST: Manifest information

Hazardous waste manifest information

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 12/31/2012  
Date Data Arrived at EDR: 06/21/2013  
Date Made Active in Reports: 08/05/2013  
Number of Days to Update: 45

Source: Department of Environmental Management  
Telephone: 401-222-2797  
Last EDR Contact: 05/27/2014  
Next Scheduled EDR Contact: 09/08/2014  
Data Release Frequency: Annually

VT MANIFEST: Hazardous Waste Manifest Data  
Hazardous waste manifest information.

Date of Government Version: 12/30/2013  
Date Data Arrived at EDR: 02/11/2014  
Date Made Active in Reports: 03/11/2014  
Number of Days to Update: 28

Source: Department of Environmental Conservation  
Telephone: 802-241-3443  
Last EDR Contact: 05/19/2014  
Next Scheduled EDR Contact: 08/04/2014  
Data Release Frequency: Annually

WI MANIFEST: Manifest Information  
Hazardous waste manifest information.

Date of Government Version: 12/31/2012  
Date Data Arrived at EDR: 08/09/2013  
Date Made Active in Reports: 09/27/2013  
Number of Days to Update: 49

Source: Department of Natural Resources  
Telephone: N/A  
Last EDR Contact: 06/16/2014  
Next Scheduled EDR Contact: 09/29/2014  
Data Release Frequency: Annually

Oil/Gas Pipelines: This data was obtained by EDR from the USGS in 1994. It is referred to by USGS as GeoData Digital Line Graphs from 1:100,000-Scale Maps. It was extracted from the transportation category including some oil, but primarily gas pipelines.

Electric Power Transmission Line Data

Source: Rextag Strategies Corp.  
Telephone: (281) 769-2247

U.S. Electric Transmission and Power Plants Systems Digital GIS Data

Sensitive Receptors: There are individuals deemed sensitive receptors due to their fragile immune systems and special sensitivity to environmental discharges. These sensitive receptors typically include the elderly, the sick, and children. While the location of all sensitive receptors cannot be determined, EDR indicates those buildings and facilities - schools, daycares, hospitals, medical centers, and nursing homes - where individuals who are sensitive receptors are likely to be located.

AHA Hospitals:

Source: American Hospital Association, Inc.  
Telephone: 312-280-5991

The database includes a listing of hospitals based on the American Hospital Association's annual survey of hospitals.

Medical Centers: Provider of Services Listing

Source: Centers for Medicare & Medicaid Services  
Telephone: 410-786-3000

A listing of hospitals with Medicare provider number, produced by Centers of Medicare & Medicaid Services, a federal agency within the U.S. Department of Health and Human Services.

Nursing Homes

Source: National Institutes of Health  
Telephone: 301-594-6248

Information on Medicare and Medicaid certified nursing homes in the United States.

Public Schools

Source: National Center for Education Statistics  
Telephone: 202-502-7300

The National Center for Education Statistics' primary database on elementary and secondary public education in the United States. It is a comprehensive, annual, national statistical database of all public elementary and secondary schools and school districts, which contains data that are comparable across all states.

Private Schools

Source: National Center for Education Statistics  
Telephone: 202-502-7300

The National Center for Education Statistics' primary database on private school locations in the United States.

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Daycare Centers: Licensed Child Day Care Facilities  
Source: Department of Job & Family Services  
Telephone: 614-466-6282

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 2003 & 2011 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002, 2005 and 2010 from the U.S. Fish and Wildlife Service.

State Wetlands Data: Wetlands Inventory  
Source: Department of Natural Resources  
Telephone: 614-265-1044

Scanned Digital USGS 7.5' Topographic Map (DRG)

Source: United States Geologic Survey

A digital raster graphic (DRG) is a scanned image of a U.S. Geological Survey topographic map. The map images are made by scanning published paper maps on high-resolution scanners. The raster image is georeferenced and fit to the Universal Transverse Mercator (UTM) projection.

### **STREET AND ADDRESS INFORMATION**

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## **GEOCHECK<sup>®</sup> - PHYSICAL SETTING SOURCE ADDENDUM**

### **TARGET PROPERTY ADDRESS**

135 HICKORY STREET  
135 HICKORY STREET  
DEFIANCE, OH 43512

### **TARGET PROPERTY COORDINATES**

Latitude (North):	41.2807 - 41° 16' 50.52"
Longitude (West):	84.3406 - 84° 20' 26.16"
Universal Transverse Mercator:	Zone 16
UTM X (Meters):	722724.6
UTM Y (Meters):	4573117.5
Elevation:	713 ft. above sea level

### **USGS TOPOGRAPHIC MAP**

Target Property Map:	41084-C3 DEFIANCE EAST, OH
Most Recent Revision:	1979

EDR's GeoCheck Physical Setting Source Addendum is provided to assist the environmental professional in forming an opinion about the impact of potential contaminant migration.

Assessment of the impact of contaminant migration generally has two principal investigative components:

1. Groundwater flow direction, and
2. Groundwater flow velocity.

Groundwater flow direction may be impacted by surface topography, hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata.

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

### GROUNDWATER FLOW DIRECTION INFORMATION

Groundwater flow direction for a particular site is best determined by a qualified environmental professional using site-specific well data. If such data is not reasonably ascertainable, it may be necessary to rely on other sources of information, such as surface topographic information, hydrologic information, hydrogeologic data collected on nearby properties, and regional groundwater flow information (from deep aquifers).

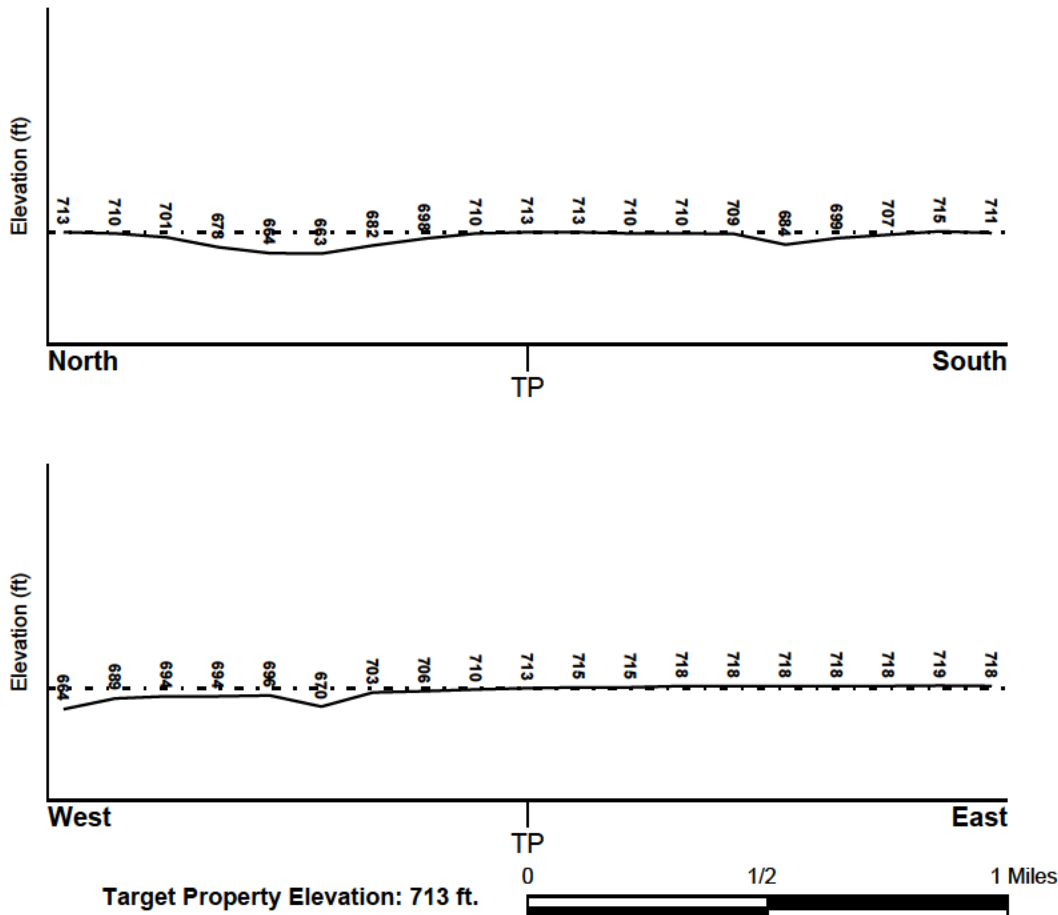
### TOPOGRAPHIC INFORMATION

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

### TARGET PROPERTY TOPOGRAPHY

General Topographic Gradient: General NW

### SURROUNDING TOPOGRAPHY: ELEVATION PROFILES



Source: Topography has been determined from the USGS 7.5' Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified.

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

### HYDROLOGIC INFORMATION

Surface water can act as a hydrologic barrier to groundwater flow. Such hydrologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Refer to the Physical Setting Source Map following this summary for hydrologic information (major waterways and bodies of water).

### FEMA FLOOD ZONE

Target Property County  
DEFIANCE, OH

FEMA Flood  
Electronic Data  
YES - refer to the Overview Map and Detail Map

Flood Plain Panel at Target Property:

39039C - FEMA DFIRM Flood data

Additional Panels in search area:

Not Reported

### NATIONAL WETLAND INVENTORY

NWI Quad at Target Property  
NOT AVAILABLE

NWI Electronic  
Data Coverage  
YES - refer to the Overview Map and Detail Map

### HYDROGEOLOGIC INFORMATION

Hydrogeologic information obtained by installation of wells on a specific site can often be an indicator of groundwater flow direction in the immediate area. Such hydrogeologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

### AQUIFLOW®

Search Radius: 1.000 Mile.

EDR has developed the AQUIFLOW Information System to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted by environmental professionals to regulatory authorities at select sites and has extracted the date of the report, groundwater flow direction as determined hydrogeologically, and the depth to water table.

<u>MAP ID</u>	<u>LOCATION</u> <u>FROM TP</u>	<u>GENERAL DIRECTION</u> <u>GROUNDWATER FLOW</u>
Not Reported		



## **GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY**

### **GROUNDWATER FLOW VELOCITY INFORMATION**

Groundwater flow velocity information for a particular site is best determined by a qualified environmental professional using site specific geologic and soil strata data. If such data are not reasonably ascertainable, it may be necessary to rely on other sources of information, including geologic age identification, rock stratigraphic unit and soil characteristics data collected on nearby properties and regional soil information. In general, contaminant plumes move more quickly through sandy-gravelly types of soils than silty-clayey types of soils.

### **GEOLOGIC INFORMATION IN GENERAL AREA OF TARGET PROPERTY**

Geologic information can be used by the environmental professional in forming an opinion about the relative speed at which contaminant migration may be occurring.

#### **ROCK STRATIGRAPHIC UNIT**

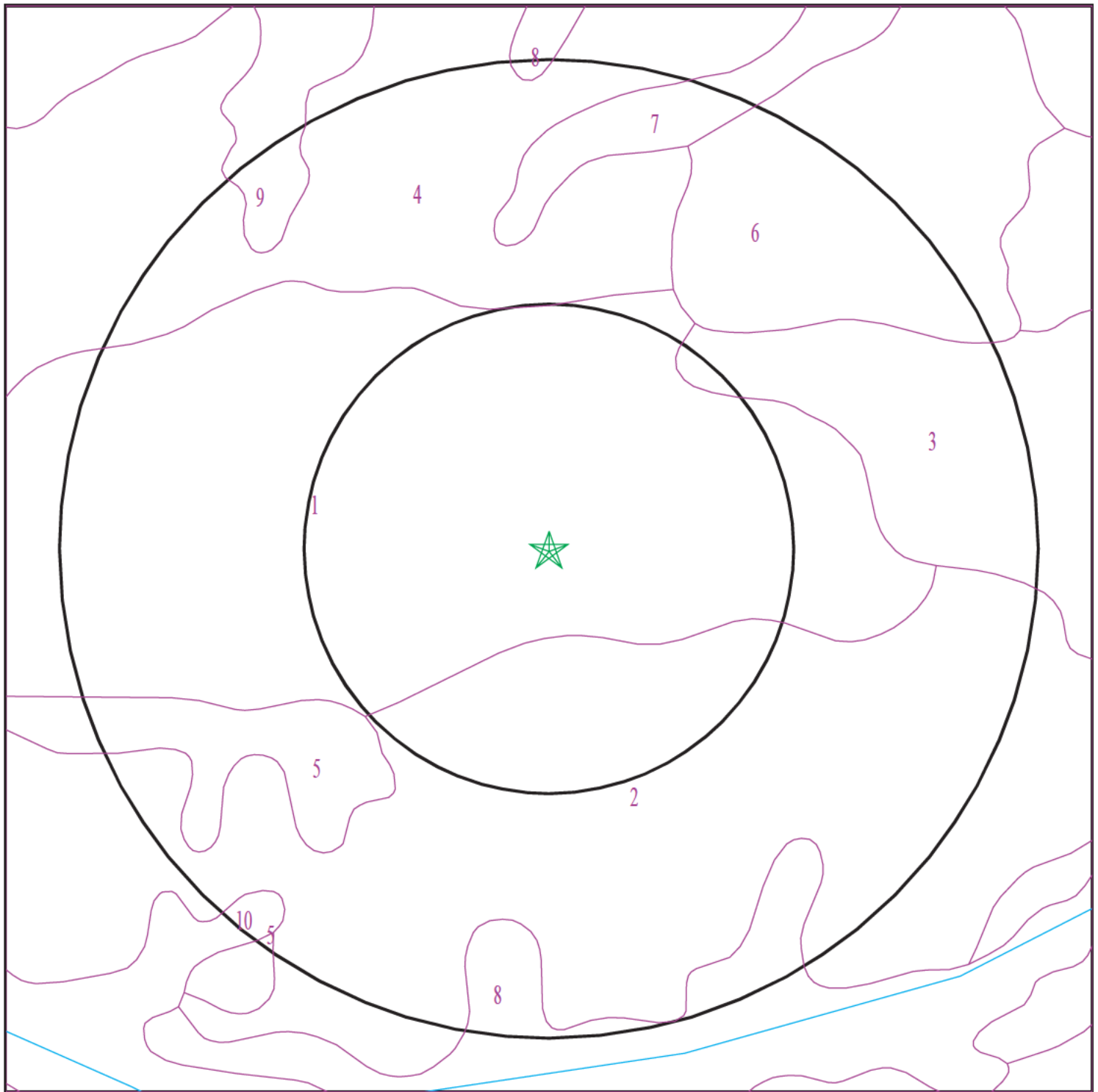
Era:	Paleozoic
System:	Devonian
Series:	Upper Devonian
Code:	D3 (decoded above as Era, System & Series)

#### **GEOLOGIC AGE IDENTIFICATION**

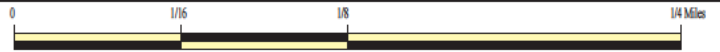
Category: Stratified Sequence

Geologic Age and Rock Stratigraphic Unit Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - a digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

# SSURGO SOIL MAP - 3974220.2s



- ★ Target Property
- SSURGO Soil
- Water



SITE NAME: 135 Hickory Street  
ADDRESS: 135 Hickory Street  
Defiance OH 43512  
LAT/LONG: 41.2807 / 84.3406

CLIENT: Keramida Environmental, Inc.  
CONTACT: Tim  
INQUIRY #: 3974220.2s  
DATE: June 17, 2014 3:02 pm

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

### DOMINANT SOIL COMPOSITION IN GENERAL AREA OF TARGET PROPERTY

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the National Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. The following information is based on Soil Conservation Service SSURGO data.

#### Soil Map ID: 1

Soil Component Name: Fulton

Soil Surface Texture: loam

Hydrologic Group: Class D - Very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.

Soil Drainage Class: Somewhat poorly drained

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 53 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	7 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay Soils.	Max: 14.11 Min: 4.23	Max: 7.3 Min: 5.1
2	7 inches	14 inches	silty clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.41 Min: 0.42	Max: 7.8 Min: 5.1
3	14 inches	31 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.41 Min: 0.42	Max: 7.8 Min: 5.1
4	31 inches	59 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.41 Min: 0.06	Max: 8.4 Min: 7.4

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

### Soil Map ID: 2

Soil Component Name: Fulton

Soil Surface Texture: silty clay loam

Hydrologic Group: Class D - Very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.

Soil Drainage Class: Somewhat poorly drained

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 53 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	9 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 4.23 Min: 1.41	Max: 7.3 Min: 5.1
2	9 inches	14 inches	silty clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.41 Min: 0.42	Max: 7.8 Min: 5.1
3	14 inches	37 inches	silty clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.41 Min: 0.42	Max: 7.8 Min: 5.1
4	37 inches	59 inches	silty clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.41 Min: 0.06	Max: 8.4 Min: 7.4

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

### Soil Map ID: 3

Soil Component Name: Latty

Soil Surface Texture: silty clay

Hydrologic Group: Class D - Very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.

Soil Drainage Class: Very poorly drained

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 15 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	7 inches	silty clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Elastic silt.	Max: 1.41 Min: 0.42	Max: 7.8 Min: 6.1
2	7 inches	40 inches	silty clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.41 Min: 0.42	Max: 7.8 Min: 6.1
3	40 inches	59 inches	silty clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 0.42 Min: 0.06	Max: 8.4 Min: 7.4

### Soil Map ID: 4

Soil Component Name: Del Rey

Soil Surface Texture: silt loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Somewhat poorly drained

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 61 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	7 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 14.11 Min: 4.23	Max: 7.3 Min: 4.5
2	7 inches	31 inches	silty clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 1.41 Min: 0.42	Max: 8.4 Min: 4.5
3	31 inches	59 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 1.41 Min: 0.42	Max: 8.4 Min: 7.9

### Soil Map ID: 5

Soil Component Name: Udorthents

Soil Surface Texture: silt loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class:  
Hydric Status: Unknown

Corrosion Potential - Uncoated Steel: Not Reported

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

No Layer Information available.

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

### Soil Map ID: 6

Soil Component Name: Nappanee

Soil Surface Texture: loam

Hydrologic Group: Class D - Very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.

Soil Drainage Class: Somewhat poorly drained

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 46 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	7 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 14.11 Min: 4.23	Max: 7.3 Min: 5.1
2	7 inches	38 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.41 Min: 0.42	Max: 7.8 Min: 5.1
3	38 inches	59 inches	clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 1.41 Min: 0.42	Max: 8.4 Min: 7.4

### Soil Map ID: 7

Soil Component Name: St. Clair

Soil Surface Texture: loam

Hydrologic Group: Class D - Very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.

Soil Drainage Class: Moderately well drained

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Hydric Status: Unknown

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 76 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	9 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 14.11 Min: 4.23	Max: 7.3 Min: 5.6
2	9 inches	24 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.41 Min: 0.06	Max: 7.3 Min: 5.6
3	24 inches	59 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.41 Min: 0.06	Max: 8.4 Min: 7.4

### Soil Map ID: 8

Soil Component Name: St. Clair

Soil Surface Texture: clay

Hydrologic Group: Class D - Very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.

Soil Drainage Class: Moderately well drained

Hydric Status: Unknown

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 76 inches



## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	3 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 1.41 Min: 0.42	Max: 7.3 Min: 5.6
2	3 inches	22 inches	silty clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.41 Min: 0.06	Max: 7.3 Min: 5.6
3	22 inches	59 inches	silty clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.41 Min: 0.06	Max: 8.4 Min: 7.4

### Soil Map ID: 9

Soil Component Name: St. Clair

Soil Surface Texture: silty clay loam

Hydrologic Group: Class D - Very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.

Soil Drainage Class: Moderately well drained

Hydric Status: Unknown

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 76 inches

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	7 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 14.11 Min: 1.41	Max: 7.3 Min: 5.6
2	7 inches	25 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.41 Min: 0.06	Max: 7.3 Min: 5.6
3	25 inches	59 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 1.41 Min: 0.06	Max: 8.4 Min: 7.4

### Soil Map ID: 10

Soil Component Name: Sloan

Soil Surface Texture: silty clay loam

Hydrologic Group: Class B/D - Drained/undrained hydrology class of soils that can be drained and are classified.

Soil Drainage Class: Very poorly drained

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: High

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 15 inches

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	11 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 14.11 Min: 4.23	Max: 7.8 Min: 6.1
2	11 inches	44 inches	clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 14.11 Min: 1.41	Max: 8.4 Min: 6.1
3	44 inches	59 inches	stratified gravelly sandy loam to silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 14.11 Min: 1.41	Max: 8.4 Min: 6.6

### LOCAL / REGIONAL WATER AGENCY RECORDS

EDR Local/Regional Water Agency records provide water well information to assist the environmental professional in assessing sources that may impact ground water flow direction, and in forming an opinion about the impact of contaminant migration on nearby drinking water wells.

### WELL SEARCH DISTANCE INFORMATION

<u>DATABASE</u>	<u>SEARCH DISTANCE (miles)</u>
Federal USGS	1.000
Federal FRDS PWS	Nearest PWS within 1 mile
State Database	1.000

### **FEDERAL USGS WELL INFORMATION**

<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
No Wells Found		

### **FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION**

<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
1	OH2033012	1/2 - 1 Mile WNW

Note: PWS System location is not always the same as well location.

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

### STATE DATABASE WELL INFORMATION

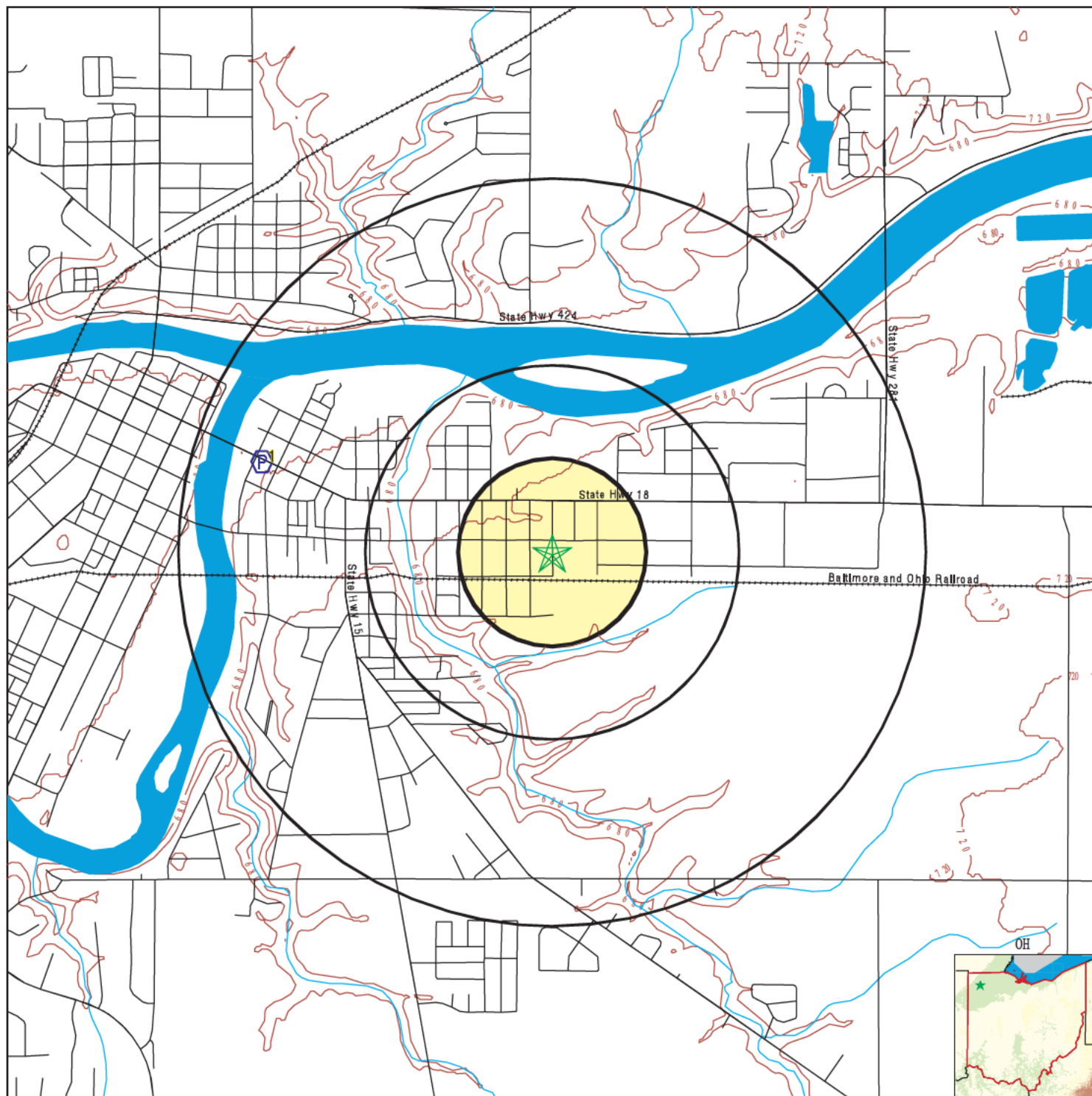
MAP ID

No Wells Found

WELL ID

LOCATION  
FROM TP

# PHYSICAL SETTING SOURCE MAP - 3974220.2s



- County Boundary
- Major Roads
- Contour Lines
- Earthquake epicenter, Richter 5 or greater
- Water Wells
- Public Water Supply Wells
- Cluster of Multiple Icons

- Groundwater Flow Direction
- Indeterminate Groundwater Flow at Location
- Groundwater Flow Varies at Location

SITE NAME: 135 Hickory Street  
 ADDRESS: 135 Hickory Street  
 Defiance OH 43512  
 LAT/LONG: 41.2807 / 84.3406

CLIENT: Keramida Environmental, Inc.  
 CONTACT: Tim  
 INQUIRY #: 3974220.2s  
 DATE: June 17, 2014 3:02 pm

# GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID  
Direction  
Distance  
Elevation

Database EDR ID Number

1

**WNW**  
**1/2 - 1 Mile**  
**Lower**

**FRDS PWS OH2033012**

Pwsid:	OH2033012	Epa region:	05
State:	OH	County:	Defiance
Pws name:	ST STEPHEN'S LUTHERAN CHURCH-DEFIANCE		
Population Served:	100	Pwssvconn:	3
PWS Source:	Groundwater		
Pws type:	TNCWS		
Status:	Closed	Owner type:	Public/Private
Facility id:	13009		
Facility name:	ST STEPHEN'S LUTHERAN CHURCH		
Facility type:	Treatment_plant	Treatment process:	innovative
Treatment objective:	other		
Contact name:	ST STEPHEN'S LUTHERAN CHURCH		
Original name:	Not Reported		
Contact phone:	419-395-1507	Contact address1:	30316 NEW BAVARIA ROAD
Contact address2:	Not Reported		
Contact city:	DEFIANCE		
Contact zip:	43512		

Facility id:	85322		
Facility name:	ST STEPHEN'S LUTH CHURCH WELL 0001		
Facility type:	Well	Treatment process:	innovative
Treatment objective:	other		

Facility id:	85324		
Facility name:	ST STEPHEN'S LUTH CHURCH P01		
Facility type:	Sampling_station	Treatment process:	innovative
Treatment objective:	other		

PWS ID:	OH2033012		
Date Initiated:	Not Reported	Date Deactivated:	Not Reported
PWS Name:	ST JOHNS LUTHERAN CHURCH		
	PASTOR		
	RR 6		
	DEFIANCE, OH 43512		

Addressee / Facility: Not Reported

Facility Latitude:	41 17 03	Facility Longitude:	084 21 20
City Served:	Not Reported		
Treatment Class:	Treated	Population:	00000150

Violations information not reported.

## ENFORCEMENT INFORMATION:

System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	MCL, Acute (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-04-01 - 1995-06-30		
Violation ID:	9505813		
Enforcement Date:	1995-07-21	Enf. Action:	State Violation/Reminder Notice

## GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

### ENFORCEMENT INFORMATION:

System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	MCL, Acute (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-04-01 - 1995-06-30		
Violation ID:	9505813		
Enforcement Date:	1995-07-21	Enf. Action:	State Public Notif Requested
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	MCL, Acute (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-04-01 - 1995-06-30		
Violation ID:	9505813		
Enforcement Date:	1995-07-28	Enf. Action:	State Public Notif Received
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	MCL, Acute (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-04-01 - 1995-06-30		
Violation ID:	9505813		
Enforcement Date:	1996-04-30	Enf. Action:	EPA Generated Implicit TCR RTC
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	MCL, Monthly (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-04-01 - 1995-06-30		
Violation ID:	9505814		
Enforcement Date:	1995-07-21	Enf. Action:	State Violation/Reminder Notice
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	MCL, Monthly (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-04-01 - 1995-06-30		
Violation ID:	9505814		
Enforcement Date:	1995-07-21	Enf. Action:	State Public Notif Requested
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	MCL, Monthly (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-04-01 - 1995-06-30		
Violation ID:	9505814		
Enforcement Date:	1995-07-28	Enf. Action:	State Public Notif Received
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	MCL, Monthly (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-04-01 - 1995-06-30		
Violation ID:	9505814		
Enforcement Date:	1996-04-30	Enf. Action:	EPA Generated Implicit TCR RTC
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	MCL, Acute (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-10-01 - 1995-10-31		
Violation ID:	9641040		
Enforcement Date:	1996-04-30	Enf. Action:	EPA Generated Implicit TCR RTC
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	MCL, Acute (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-10-01 - 1995-10-31		
Violation ID:	9641040		
Enforcement Date:	1995-11-16	Enf. Action:	State Public Notif Requested

## GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

### ENFORCEMENT INFORMATION:

System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	MCL, Acute (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-10-01 - 1995-10-31		
Violation ID:	9641040		
Enforcement Date:	1995-11-16	Enf. Action:	State Violation/Reminder Notice
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	MCL, Acute (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-10-01 - 1995-10-31		
Violation ID:	9641040		
Enforcement Date:	1995-11-22	Enf. Action:	State Public Notif Received
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	MCL, Monthly (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-10-01 - 1995-10-31		
Violation ID:	9641041		
Enforcement Date:	1996-04-30	Enf. Action:	EPA Generated Implicit TCR RTC
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	MCL, Monthly (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-10-01 - 1995-10-31		
Violation ID:	9641041		
Enforcement Date:	1995-11-16	Enf. Action:	State Public Notif Requested
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	MCL, Monthly (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-10-01 - 1995-10-31		
Violation ID:	9641041		
Enforcement Date:	1995-11-16	Enf. Action:	State Violation/Reminder Notice
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	MCL, Monthly (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-10-01 - 1995-10-31		
Violation ID:	9641041		
Enforcement Date:	1995-11-22	Enf. Action:	State Public Notif Received
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	Monitoring, Routine Minor (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1998-07-01 - 1998-09-30		
Violation ID:	98017517		
Enforcement Date:	1998-10-23 S	Enf. Action:	IA
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	Monitoring, Routine Minor (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1998-07-01 - 1998-09-30		
Violation ID:	98017517		
Enforcement Date:	1998-10-23 S	Enf. Action:	IE
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	Monitoring, Routine Minor (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1998-07-01 - 1998-09-30		
Violation ID:	98017517		
Enforcement Date:	1998-11-03 S	Enf. Action:	IF



## GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

### ENFORCEMENT INFORMATION:

System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	Monitoring, Routine Minor (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1998-07-01 - 1998-09-30		
Violation ID:	98017517		
Enforcement Date:	1998-10-23	Enf. Action:	State Violation/Reminder Notice
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	Monitoring, Routine Minor (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1998-07-01 - 1998-09-30		
Violation ID:	98017517		
Enforcement Date:	1998-10-23	Enf. Action:	State Public Notif Requested
System Name:	ST STEPHEN'S LUTH CHURCH		
Violation Type:	Monitoring, Routine Minor (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1998-07-01 - 1998-09-30		
Violation ID:	98017517		
Enforcement Date:	1998-11-03	Enf. Action:	State Public Notif Received

# GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

## RADON

### AREA RADON INFORMATION

State Database: OH Radon

#### Radon Test Results

Zipcode	Num Tests	Maximum	Minimum	Arith Mean	Geo Mean
43512	135	21.2	0.1	3.53	2.43

Federal EPA Radon Zone for DEFIANCE County: 2

Note: Zone 1 indoor average level > 4 pCi/L.  
: Zone 2 indoor average level >= 2 pCi/L and <= 4 pCi/L.  
: Zone 3 indoor average level < 2 pCi/L.

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Federal Area Radon Information for Zip Code: 43512

Number of sites tested: 4

Area	Average Activity	% <4 pCi/L	% 4-20 pCi/L	% >20 pCi/L
Living Area - 1st Floor	1.700 pCi/L	100%	0%	0%
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	2.425 pCi/L	100%	0%	0%

# PHYSICAL SETTING SOURCE RECORDS SEARCHED

## **TOPOGRAPHIC INFORMATION**

### **USGS 7.5' Digital Elevation Model (DEM)**

Source: United States Geologic Survey

EDR acquired the USGS 7.5' Digital Elevation Model in 2002 and updated it in 2006. The 7.5 minute DEM corresponds to the USGS 1:24,000- and 1:25,000-scale topographic quadrangle maps. The DEM provides elevation data with consistent elevation units and projection.

### **Scanned Digital USGS 7.5' Topographic Map (DRG)**

Source: United States Geologic Survey

A digital raster graphic (DRG) is a scanned image of a U.S. Geological Survey topographic map. The map images are made by scanning published paper maps on high-resolution scanners. The raster image is georeferenced and fit to the Universal Transverse Mercator (UTM) projection.

## **HYDROLOGIC INFORMATION**

**Flood Zone Data:** This data, available in select counties across the country, was obtained by EDR in 2003 & 2011 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

**NWI:** National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002, 2005 and 2010 from the U.S. Fish and Wildlife Service.

### **State Wetlands Data: Wetlands Inventory**

Source: Department of Natural Resources

Telephone: 614-265-1044

## **HYDROGEOLOGIC INFORMATION**

### **AQUIFLOW<sup>R</sup> Information System**

Source: EDR proprietary database of groundwater flow information

EDR has developed the AQUIFLOW Information System (AIS) to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted to regulatory authorities at select sites and has extracted the date of the report, hydrogeologically determined groundwater flow direction and depth to water table information.

## **GEOLOGIC INFORMATION**

### **Geologic Age and Rock Stratigraphic Unit**

Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - A digital representation of the 1974 P.B. King and H.M. Be kman Map, USGS Digital Data Series DDS - 11 (1994).

### **STATSGO: State Soil Geographic Database**

Source: Department of Agriculture, Natural Resources Conservation Services

The U.S. Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS) leads the national Conservation Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps.

### **SSURGO: Soil Survey Geographic Database**

Source: Department of Agriculture, Natural Resources Conservation Services (NRCS)

Telephone: 800-672-5559

SSURGO is the most detailed level of mapping done by the Natural Resources Conservation Services, mapping scales generally range from 1:12,000 to 1:63,360. Field mapping methods using national standards are used to construct the soil maps in the Soil Survey Geographic (SSURGO) database. SSURGO digitizing duplicates the original soil survey maps. This level of mapping is designed for use by landowners, townships and county natural resource planning and management.

# PHYSICAL SETTING SOURCE RECORDS SEARCHED

## LOCAL / REGIONAL WATER AGENCY RECORDS

### FEDERAL WATER WELLS

#### PWS: Public Water Systems

Source: EPA/Office of Drinking Water

Telephone: 202-564-3750

Public Water System data from the Federal Reporting Data System. A PWS is any water system which provides water to at least 25 people for at least 60 days annually. PWSs provide water from wells, rivers and other sources.

#### PWS ENF: Public Water Systems Violation and Enforcement Data

Source: EPA/Office of Drinking Water

Telephone: 202-564-3750

Violation and Enforcement data for Public Water Systems from the Safe Drinking Water Information System (SDWIS) after August 1995. Prior to August 1995, the data came from the Federal Reporting Data System (FRDS).

#### USGS Water Wells: USGS National Water Inventory System (NWIS)

This database contains descriptive information on sites where the USGS collects or has collected data on surface water and/or groundwater. The groundwater data includes information on wells, springs, and other sources of groundwater.

### STATE RECORDS

#### Public Water System Data

Source: Ohio Environmental Protection Agency

Telephone: 614-644-2752

The database includes community, transient noncommunity and nontransient noncommunity water wells; and source treatment unit locations.

#### Water Well Database

Source: Department of Natural Resources

Telephone: 614-265-6740

## OTHER STATE DATABASE INFORMATION

### RADON

#### State Database: OH Radon

Source: Department of Health

Telephone: 614-644-2727

Radon Statistics for Zip Code Areas

#### Area Radon Information

Source: USGS

Telephone: 703-356-4020

The National Radon Database has been developed by the U.S. Environmental Protection Agency (USEPA) and is a compilation of the EPA/State Residential Radon Survey and the National Residential Radon Survey. The study covers the years 1986 - 1992. Where necessary data has been supplemented by information collected at private sources such as universities and research institutions.

#### EPA Radon Zones

Source: EPA

Telephone: 703-356-4020

Sections 307 & 309 of IRAA directed EPA to list and identify areas of U.S. with the potential for elevated indoor radon levels.

### OTHER

#### Airport Landing Facilities: Private and public use landing facilities

Source: Federal Aviation Administration, 800-457-6656

#### Epicenters: World earthquake epicenters, Richter 5 or greater

Source: Department of Commerce, National Oceanic and Atmospheric Administration

Earthquake Fault Lines: The fault lines displayed on EDR's Topographic map are digitized quaternary faultlines, prepared in 1975 by the United State Geological Survey

## PHYSICAL SETTING SOURCE RECORDS SEARCHED

### STREET AND ADDRESS INFORMATION

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**VAP PHASE I PROPERTY ASSESSMENT  
FORMER SK HAND TOOLS  
135 HICKORY STREET  
DEFIANCE, OHIO 43512  
KERAMIDA PROJECT NO. 15831**

**ATTACHMENT 5**

Interview Documentation

Correspondence with Local, State, and Federal Agencies and Provided Records



4722 Madison Road  
Cincinnati, OH 45227  
(513) 769-9057 • Fax (513) 772-5727  
**1-800-508-8034**  
[www.keramida.com](http://www.keramida.com)

June 17, 2014

Bureau of Underground Storage Tank Regulations  
Attn: Nancy Caldwell  
FOIA Request  
[Nancy.Caldwell@com.state.oh.us](mailto:Nancy.Caldwell@com.state.oh.us)

RE: Freedom of Information Act Request  
Phase I Environmental Site Assessment, Project No. P18739  
135 Hickory Street, Defiance, Ohio 43512

This is a formal request under the Freedom of Information Act.

As part of a records search, Keramida Inc. would like to request copies of any files related to the property listed below. Specifically, we would like copies of files regarding any hazardous materials storage, releases, leaks, spills, enforcement actions, emergency responses, or other similar information.

The following is the property of interest:  
135 Hickory Street, Defiance, Ohio 43512 (Former Facility Name: SK Hand Tools).

Please feel free to call us with any questions that may arise regarding this request or your search. Thank you for your time and consideration of this matter.

Sincerely,  
**KERAMIDA Inc.**

Timothy Schnieber  
[tschnieber@keramida.com](mailto:tschnieber@keramida.com)



4722 Madison Road  
Cincinnati, OH 45227  
(513) 769-9057 • Fax (513) 772-5727  
**1-800-508-8034**  
[www.keramida.com](http://www.keramida.com)

June 17, 2014

Defiance Fire Department  
Attn: Information Officer  
702 W. 3<sup>rd</sup> Street  
Defiance, Ohio 43512  
Phone: (419) 782-2771  
Fax: (419) 782-2025

RE: Freedom of Information Act Request  
Phase I Environmental Site Assessment, Project No. P18739  
135 Hickory Street, Defiance, Ohio 43512

This is a formal request under the Freedom of Information Act.

As part of a records search, Keramida Inc. would like to request copies of any files related to the property listed below. Specifically, we would like copies of files regarding any hazardous material storage, releases, leaks, spills, enforcement actions, emergency responses, or other similar information.

The following is the property of interest:  
135 Hickory Street, Defiance, Ohio 43512 (Former Facility Name: SK Hand Tools).

Please feel free to call us with any questions that may arise regarding this request or your search.  
Thank you for your time and consideration of this matter.

Sincerely,  
**KERAMIDA Inc.**

Timothy Schnieber  
[tschnieber@keramida.com](mailto:tschnieber@keramida.com)





4722 Madison Road  
Cincinnati, OH 45227  
(513) 769-9057 • Fax (513) 772-5727  
**1-800-508-8034**  
[www.keramida.com](http://www.keramida.com)

June 17, 2014

Defiance County Health Department  
Attn: Information Officer  
1300 East Second Street, Suite 100  
Defiance, Ohio 43512  
Phone: (419) 784-3818  
Fax: (419) 782-4979

RE: Freedom of Information Act Request  
Phase I Environmental Site Assessment, Project No. P18739  
135 Hickory Street, Defiance, Ohio 43512

This is a formal request under the Freedom of Information Act.

As part of a records search, Keramida Inc. would like to request copies of any files related to the property listed below. Specifically, we would like copies of files regarding any hazardous material storage, releases, leaks, spills, enforcement actions, emergency responses, or other similar information.

The following is the property of interest:  
135 Hickory Street, Defiance, Ohio 43512 (Former Facility Name: SK Hand Tools).

Please feel free to call us with any questions that may arise regarding this request or your search. Thank you for your time and consideration of this matter.

Sincerely,  
**KERAMIDA Inc.**

Timothy Schnieber  
[tschnieber@keramida.com](mailto:tschnieber@keramida.com)



4722 Madison Road  
Cincinnati, OH 45227  
(513) 769-9057 • Fax (513) 772-5727  
**1-800-508-8034**

tschnieber@keramida.com • www.keramida.com

June 17, 2014

Defiance County LEPC  
Attn: Information Coordinator  
22491 Mill St.  
Defiance, OH 43512  
Phone: (419) 782-1130  
ema@defiance-county.com

RE: Freedom of Information Act Request  
Phase I Environmental Site Assessment, Project No. P18739  
135 Hickory Street, Defiance, Ohio 43512

This is a formal request under the Freedom of Information Act.

As part of a records search, Keramida Inc. would like to request copies of any files related to the property listed below. Specifically, we would like copies of files regarding any hazardous material storage, releases, leaks, spills, enforcement actions, emergency responses, or other similar information.

The following is the property of interest:  
135 Hickory Street, Defiance, Ohio 43512 (Former Facility Name: SK Hand Tools).

Please feel free to call us with any questions that may arise regarding this request or your search.  
Thank you for your time and consideration of this matter.

Sincerely,  
**KERAMIDA Inc.**

Timothy Schnieber  
[tschnieber@keramida.com](mailto:tschnieber@keramida.com)



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Cincinnati, OH 45227  
(513) 769-9057 • Fax (513) 772-5727  
**1-800-508-8034**  
[www.keramida.com](http://www.keramida.com)

June 17, 2014

Ohio EPA Northwest District Office  
Lynn Ackerson  
347 N. Dunbridge Road  
Bowling Green, Ohio 43402  
Phone: (419) 352-8461  
Fax: (419) 352-8468  
[lynn.ackerson@epa.ohio.gov](mailto:lynn.ackerson@epa.ohio.gov)

RE: Information Request  
Phase I Environmental Site Assessment  
135 Hickory Street, Defiance, Ohio 43512  
KERAMIDA Project No. P18739

As part of a records search, we would like to request copies of any files related to the property listed below. Specifically, we would like copies of files regarding any hazardous materials storage, releases, leaks, spills or underground storage tanks.

The following is the property of interest:  
135 Hickory Street, Defiance, Ohio 43512 (Former Facility Name: SK Hand Tools).

Please forward the results of the file search to Timothy Schnieber by fax or mail to the address in the letter head above or by email to [tschnieber@keramida.com](mailto:tschnieber@keramida.com). Additionally, please feel free to call us with any questions that may arise regarding this request or your search. Thank you for your time and consideration of this matter.

Sincerely,  
**KERAMIDA Inc.**

Timothy Schnieber  
[tschnieber@keramida.com](mailto:tschnieber@keramida.com)



4722 Madison Road  
Cincinnati, OH 45227  
(513) 769-9057 • Fax (513) 772-5727  
**1-800-508-8034**

tschnieber@keramida.com • www.keramida.com

June 26, 2014

Freedom of Information Officer  
US EPA Region 5 (MI-9J)  
77 West Jackson Blvd  
Chicago, IL 60604-3590  
[R5foia@epa.gov](mailto:R5foia@epa.gov)  
Fax: (312) 886-1515

RE: Information Request  
Phase I Environmental Site Assessment  
135 Hickory Street, Defiance, Ohio 43512  
KERAMIDA Project No. 15831

As part of a records search, we would like to request copies of any files related to the property listed below. Specifically, we would like copies of files regarding any hazardous materials, storage, releases, leaks, spills or underground storage tanks.

The following is the property of interest:  
135 Hickory Street, Defiance, Ohio 43512 (Former Facility Name: SK Hand Tool).

Please forward the results of the file search to Timothy Schnieber by fax or mail to the address in the letter head above or by email to [tschnieber@keramida.com](mailto:tschnieber@keramida.com). Additionally, please feel free to call us with any questions that may arise regarding this request or your search. Thank you for your time and consideration of this matter.

Sincerely,  
**KERAMIDA Inc.**

Timothy Schnieber  
[tschnieber@keramida.com](mailto:tschnieber@keramida.com)

---

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## Department of Commerce

Division of State Fire Marshal  
John R. Kasich, Governor  
Andre T. Porter, Director

June 17, 2014

TO: Timothy Schnieber

FROM: Nancy Caldwell  
Records Management Officer, BUSTR

On Behalf of the Bureau of Underground Storage Tank Regulations, the Records Management Section is responding to your public records request.

We have searched our data base and found no records for the address you requested:

**135 Hickory Street  
Defiance Ohio 43512**

Please do not hesitate to contact me if I can be of further assistance.

[nancy.caldwell@com.ohio.gov](mailto:nancy.caldwell@com.ohio.gov)

## Defiance County Public Safety Services

22491 Mill Street

Defiance, OH 43512

Phone: 419.782.1130 Fax: 419.782.3714

[ema@defiance-county.com](mailto:ema@defiance-county.com)

[emadd@defiance-county.com](mailto:emadd@defiance-county.com)

FAX

---

DATE: June 23, 2014

TO: Timothy Schneiber

FROM: Julie Rittenhouse 

SUBJECT: 135 Hickory Street, Defiance, OH 43512

FAX NUMBER: 513-772-5727

*25 pgs total*

---

Per your Freedom of Information Act Request dated June 17, 2014, I researched the address of your request. According to the records available to me, we have not responded to that address for any type of hazardous material release, leak, spill, emergency response or any other similar incident. We have no records of enforcement actions. We are providing copies of the following:

- Facility Site Map dated 2/26/2009
- The last Tier Two report that we received dated 2/26/2009
- The Contingency Plan for S&K Hand Tools Removal Action



Reporting Period: January 1 to December 31, 2009

## Page 1

## Printed: February 26, 2010

**FACILITY IDENTIFICATION:**

**SK Hand Tool Corporation**

**Dept:**

135 Hickory Street

Defiance, OH 43512 USA

**County: Defiance**

**Number of employees: 20**

Latitude: 41.2917

**Longitude: 84.3750**

**Method:** OT - Other

Description: OT - Other

IDENTIFICATION NUMBERS:

Dun &amp; Bradstreet: 106933963

NAICS: 332212

**CONTACT INFORMATION:**

Herrick, Tim

**Title:** Operations Mgr.      **Contact Type 1:** Owner / Operator

Address: 3535 W. 47th St., Chicago, IL, 60632 USA

Phones: Work: (773) 523-1300 ex.

[illegible]

Email: [therrick@skhandtool.com](mailto:therrick@skhandtool.com)

**Giesige, Rodney**

**Title:** Plant Manager      **Contact Type 1:** Emergency Contact

Address: 135 Hickory St., Defiance, OH, 43512 USA

**Phones: 24-hour: (419) 653-4618**

Email: [RGiesige@skhandtool.com](mailto:RGiesige@skhandtool.com)

**CHEMICAL DESCRIPTIONS:**

☒ All chemicals in inventory are identical to last year's submission

CHEM NAME: 1,2-ETHYLENEDIAMINE

**CAS: 107-15-3**

[x] Identical to previous year

[ ] TRADE SECRET

☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☒ EHS

**PHYSICAL & HEALTH HAZARDS:**

☒ Fire    ☐ Sudden Release of Pressure    ☐ Reactivity    ☒ Immediate (acute)    ☐ Delayed (chronic)

INVENTORY:

Max Daily Amt code: 02 (100 - 999 pounds)

Avg Daily Amt code: 01 (0 - 99 pounds)

**No. of days on-site: 365**



## Tier Two

Reporting Period: January 1 to December 31, 2009

## Emergency and Hazardous Chemical Inventory

Page 2

## Specific Information by Chemical

Printed: February 26, 2010

Facility Name: SK Hand Tool Corporation

## STORAGE CODES &amp; STORAGE LOCATIONS:

Container Type: D Pressure: 1 Temp: 4 Location: B, A Receiving Amount: pounds  
Container Type: C Pressure: 1 Temp: 5 Location: B, E Plating Area Amount: pounds

## CHEMICALS IN INVENTORY STATE FIELDS:

Ohio requests the following:

☐ Location is confidential

Fee classification for this reported substance: Extremely Hazardous Substance (EHS)

CHEM NAME: AMMONIA (ANHYDROUS)

CAS: 7664-41-7

☒ Identical to previous year☐ TRADE SECRET☒ Pure ☐ Mix ☐ Solid ☐ Liquid ☒ Gas ☒ EHS

## PHYSICAL &amp; HEALTH HAZARDS:

☐ Fire ☒ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)

## INVENTORY:

Max Daily Amt code: 03 (1,000 - 9,999 pounds)

Avg Daily Amt code: 02 (100 - 999 pounds)

No. of days on-site: 365

## STORAGE CODES &amp; STORAGE LOCATIONS:

Container Type: A Pressure: 1 Temp: 4 Location: T01, Outside SE Corner Amount: pounds

## CHEMICALS IN INVENTORY STATE FIELDS:

Ohio requests the following:

☐ Location is confidential

Fee classification for this reported substance: Extremely Hazardous Substance (EHS)

CHEM NAME: HYDROCHLORIC ACID

CAS: 7647-01-0

☒ Identical to previous year☐ TRADE SECRET☒ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS

## PHYSICAL &amp; HEALTH HAZARDS:

☐ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)

## INVENTORY:

Max Daily Amt code: 03 (1,000 - 9,999 pounds)

Avg Daily Amt code: 03 (1,000 - 9,999 pounds)

No. of days on-site: 365

## STORAGE CODES &amp; STORAGE LOCATIONS:

Container Type: E Pressure: 1 Temp: 4 Location: B, E West Side Plating Area Amount: pounds  
Container Type: A Pressure: 1 Temp: 4 Location: B, E 3 Tanks on Side Plater Amount: pounds  
Container Type: A Pressure: 1 Temp: 4 Location: B, E Tank on Wrench Strip Line Amount: pounds

## CHEMICALS IN INVENTORY STATE FIELDS:

Ohio requests the following:

☐ Location is confidential

Fee classification for this reported substance:

CHEM NAME: Nickel Metal

CAS:

☒ Identical to previous year

## Tier Two

Reporting Period: January 1 to December 31, 2009

## Emergency and Hazardous Chemical Inventory

Page 3

## Specific Information by Chemical

Printed: February 26, 2010

Facility Name: SK Hand Tool Corporation

☐ TRADE SECRET☒ Pure ☐ Mix ☒ Solid ☐ Liquid ☐ Gas ☐ EHS

## PHYSICAL &amp; HEALTH HAZARDS:

☐ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☐ Immediate (acute) ☒ Delayed (chronic)

## INVENTORY:

Max Daily Amt code: 03 (1,000 - 9,999 pounds)

Avg Daily Amt code: 03 (1,000 - 9,999 pounds)

No. of days on-site: 365

## STORAGE CODES &amp; STORAGE LOCATIONS:

Container Type: J Pressure: 1 Temp: 5 Location: B, A Along South Fence Shipping Amount: pounds

Container Type: J Pressure: 1 Temp: 5 Location: B, E In Nickel Plating Tanks Amount: pounds

## CHEMICALS IN INVENTORY STATE FIELDS:

Ohio requests the following:

☐ Location is confidential

Fee classification for this reported substance:

CHEM NAME: NITRIC ACID

CAS: 7697-37-2

☒ Identical to previous year☐ TRADE SECRET☒ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☒ EHS

## PHYSICAL &amp; HEALTH HAZARDS:

☐ Fire ☐ Sudden Release of Pressure ☒ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)

## INVENTORY:

Max Daily Amt code: 03 (1,000 - 9,999 pounds)

Avg Daily Amt code: 03 (1,000 - 9,999 pounds)

No. of days on-site: 365

## STORAGE CODES &amp; STORAGE LOCATIONS:

Container Type: R Pressure: 1 Temp: 4 Location: B, E Plating Area Amount: pounds

Container Type: C Pressure: 1 Temp: 5 Location: B, E Plating Area Amount: pounds

## CHEMICALS IN INVENTORY STATE FIELDS:

Ohio requests the following:

☐ Location is confidential

Fee classification for this reported substance: Extremely Hazardous Substance (EHS)

CHEM NAME: OXALIC ACID

CAS: 144-62-7

☒ Identical to previous year☐ TRADE SECRET☒ Pure ☐ Mix ☒ Solid ☐ Liquid ☐ Gas ☐ EHS

## PHYSICAL &amp; HEALTH HAZARDS:

☐ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)

## INVENTORY:

Max Daily Amt code: 04 (10,000 - 99,999 pounds)

Avg Daily Amt code: 04 (10,000 - 99,999 pounds)

No. of days on-site: 365

## STORAGE CODES &amp; STORAGE LOCATIONS:

Container Type: J Pressure: 1 Temp: 4 Location: B, A West Wall Receiving Amount: pounds

Container Type: A Pressure: 1 Temp: 4 Location: B, F South Wall Vibrate Amount: pounds

## CHEMICALS IN INVENTORY STATE FIELDS:

Ohio requests the following:

## Tier Two

Reporting Period: January 1 to December 31, 2009

## Emergency and Hazardous Chemical Inventory

Page 4

## Specific Information by Chemical

Printed: February 26, 2010

Facility Name: SK Hand Tool Corporation

☐ Location is confidential

Fee classification for this reported substance:

CHEM NAME: OXALIC ACID

CAS: 144-62-7

☒ Identical to previous year☐ TRADE SECRET☒ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS

## PHYSICAL &amp; HEALTH HAZARDS:

☐ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)

## INVENTORY:

Max Daily Amt code: 04 (10,000 - 99,999 pounds)

Avg Daily Amt code: 03 (1,000 - 9,999 pounds)

No. of days on-site: 365

## STORAGE CODES &amp; STORAGE LOCATIONS:

Container Type: J Pressure: 1 Temp: 4 Location: B, A In Receiving Area Amount: pounds

Container Type: J Pressure: 1 Temp: 4 Location: B, F South End of Vibrate Dept. Amount: pounds

Container Type: A Pressure: 1 Temp: 4 Location: B, F Feed Tank in Vibrate Dept. Amount: pounds

## CHEMICALS IN INVENTORY STATE FIELDS:

Ohio requests the following:

☐ Location is confidential

Fee classification for this reported substance:

CHEM NAME: Propane

CAS:

☒ Identical to previous year☐ TRADE SECRET☒ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS

## PHYSICAL &amp; HEALTH HAZARDS:

☒ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☐ Immediate (acute) ☐ Delayed (chronic)

## INVENTORY:

Max Daily Amt code: 04 (10,000 - 99,999 pounds)

Avg Daily Amt code: 04 (10,000 - 99,999 pounds)

No. of days on-site: 365

## STORAGE CODES &amp; STORAGE LOCATIONS:

Container Type: A Pressure: 2 Temp: 4 Location: T02 Outside NW Corner of Plant Amount: pounds

## CHEMICALS IN INVENTORY STATE FIELDS:

Ohio requests the following:

☐ Location is confidential

Fee classification for this reported substance:

CHEM NAME: SODIUM HYDROXIDE

CAS: 1310-73-2

☒ Identical to previous year☐ TRADE SECRET☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS

## CHEMICAL COMPONENTS:

☐ EHS, CAS: 1310-73-2, Component: Sodium Hydroxide, %☐ EHS, CAS: , Component: Water, %

## Tier Two

Reporting Period: January 1 to December 31, 2009

## Emergency and Hazardous Chemical Inventory

Page 5

## Specific Information by Chemical

Printed: February 26, 2010

Facility Name: SK Hand Tool Corporation

## PHYSICAL &amp; HEALTH HAZARDS:

☐ Fire ☐ Sudden Release of Pressure ☒ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)

## INVENTORY:

Max Daily Amt code: 04 (10,000 - 99,999 pounds)

Avg Daily Amt code: 04 (10,000 - 99,999 pounds)

No. of days on-site: 365

## STORAGE CODES &amp; STORAGE LOCATIONS:

Container Type: A Pressure: 1 Temp: 5 Location: D, E Plater Cleaning Tanks Amount: pounds

## CHEMICALS IN INVENTORY STATE FIELDS:

Ohio requests the following:

☐ Location is confidential

Fee classification for this reported substance:

CHEM NAME: SODIUM HYDROXIDE

CAS: 1310-73-2

☒ Identical to previous year☐ TRADE SECRET☒ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS

## PHYSICAL &amp; HEALTH HAZARDS:

☐ Fire ☐ Sudden Release of Pressure ☒ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)

## INVENTORY:

Max Daily Amt code: 04 (10,000 - 99,999 pounds)

Avg Daily Amt code: 03 (1,000 - 9,999 pounds)

No. of days on-site: 365

## STORAGE CODES &amp; STORAGE LOCATIONS:

Container Type: A Pressure: 1 Temp: 4 Location: B, F Tank in Northeast Corner Amount: pounds

Container Type: E Pressure: 1 Temp: 4 Location: B, A Barrel Stored in Receiving Amount: pounds

Container Type: E Pressure: 1 Temp: 4 Location: B, E Barrel Stored in Plater Amount: pounds

## CHEMICALS IN INVENTORY STATE FIELDS:

Ohio requests the following:

☐ Location is confidential

Fee classification for this reported substance:

CHEM NAME: SULFURIC ACID

CAS: 7664-93-9

☐ Identical to previous year☐ TRADE SECRET☒ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☒ EHS

## PHYSICAL &amp; HEALTH HAZARDS:

☐ Fire ☐ Sudden Release of Pressure ☒ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)

## INVENTORY:

Max Daily Amt code: 03 (1,000 - 9,999 pounds)

Avg Daily Amt code: 02 (100 - 999 pounds)

No. of days on-site: 365

## STORAGE CODES &amp; STORAGE LOCATIONS:

Container Type: A Pressure: 1 Temp: 4 Location: B, E Plater WW Treatment Amount: pounds

Container Type: E Pressure: 1 Temp: 4 Location: B, E West of Plater Area Amount: pounds

## CHEMICALS IN INVENTORY STATE FIELDS:

Ohio requests the following:

☐ Location is confidential

Fee classification for this reported substance: Extremely Hazardous Substance (EHS)

**Tier Two**

Reporting Period: January 1 to December 31, 2009

**Emergency and Hazardous Chemical Inventory**

Page 6

***Specific Information by Chemical***

Printed: February 26, 2010

**Facility Name:** SK Hand Tool Corporation

**FACILITY STATE FIELDS:**

Ohio requests the following:

☐ Initial Filing (First Time Filer)

☐ Updated Filing

☒ Annual Filing

☐ Confidential Location Forms Included

Total EHS Chemicals Included:

Number of Chemicals Included:

Site or Operating Division Name:

☐ Facility Name has changed

Name of previous facility name (if known):

☐ Owner / Operator has changed

Name of previous parent company/owner (if known):

Requested Contact: Fire Dept, 2nd Emergency Contact

Requested Contact: Regulatory POC, Emergency Contact email & fax

STATE / LOCAL FEES: \$890.00

☒ I have attached a site plan

☐ I have attached a list of site coordinate abbreviations

☐ I have attached a description of dikes and other safeguard measures

**Certification (Read and sign after completing all sections)**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages one through 8,  
and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Len O'Connell

Name and official title of owner/operator  
OR owner/operator's authorized representative

2/26/2010

Signature

Date signed

**CONTINGENCY PLAN  
FOR  
S&K HAND TOOLS REMOVAL ACTION  
135 Hickory St.  
Defiance, OH**

**May 2012**

**U.S. Environmental Protection Agency  
Emergency Response Branch, Region 5  
9311 Groh Road  
Grosse Ile, MI 48138**

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## **INTRODUCTION**

The S&K Hand Tools Removal Action Contingency Plan is prepared to address emergency and/or incident releases that may arise during United States Environmental Protection Agency (U.S. EPA)'s time critical removal action at the S&K Hand Tools Site (Site) in Defiance, Ohio. This Contingency Plan discusses mitigative actions to be undertaken to mitigate actual or potential threats to human health and the environment during the S&K Hand Tools Removal Action.

U.S. EPA On-Scene Coordinator (OSC) Partap (P.C.) Lall (or designated personnel) will undertake immediate response and mitigative actions should an emergency and/or an incident release occurs during the removal action at the Site.

### **1.0 SITE IDENTIFICATION AND GENERAL INFORMATION**

Site Name: S&K Hand Tools-RV

Address: 135 Hickory Street

County: Defiance

Latitude: 41°16'49.39"N

Longitude: -84°20'21.85W

Primary Contingency Coordinator: P.C. Lall (or designated personnel)

Cell Phone No: 734-740-9015

Hotel: Holiday Inn

1148 Hotel Drive

Defiance, OH 43512

(419) 784-0782

#### **Type of Site:**

The S&K Hand Tools is a former hand tools manufacturer that conducted operations involving metal plating and polishing. Multiple chemicals associated with hand tools manufacturing operations are present at the Site in drums and containers including highly corrosive and other organic compounds. The Site was served a "Cessation of Regulated Operations (CRO)" which expired on April 15, 2011. Due to the Site's failure to comply with the CRO, and several containers remaining at the facility, a Site Assessment (SA) was conducted by U.S. EPA contractor. The SA documented hazardous chemicals in drums and containers throughout the Site. U.S. EPA is undertaking a removal action to abate threats to human health and the environment from hand tool manufacturing related chemicals present at the Site.

#### **Description of Site Activities:**

Removal action activities include setting up work areas; segregation of drums, containers, etc., sampling; hazardous waste characterization testing; similar waste group bulking; waste stream production; and waste transportation to disposal facilities. Chemicals and materials will be removed, characterized and disposed of appropriately at a disposal facility in accordance with state and federal regulations. During removal activities, continuous air monitoring for volatile organic compounds (VOCs), oxygen and explosive atmosphere will



be conducted to detect and take mitigative actions should a release of chemical vapors occur.

An office and/or a support trailer will be located in the Support Zone which will also act as the command center for coordinating emergency response actions during an incident or a release.

## **2.0 EMERGENCY COORDINATORS**

### **Primary Emergency Coordinator:**

P.C. Lall, OSC (or designated personnel)

U.S. EPA On-Scene Coordinator (OSC)

Cell Phone: 734-740-9015

Office Phone: 734-692-7685

Email: Lall.Partap@epamail.epa.gov

Hotel: Holiday Inn

Hotel Phone: (419) 784-0782

### **Alternate Emergency Coordinator:**

William (Bill) Poma

EQM Response Manager (RM)

Cell Phone: 513-659-5875

Office Phone: 513-825-7500

Email: bpoma@eqm.com

Hotel: Comfort Inn

Hotel Phone: (419) 784-4900

## **2.1 Duties of Emergency Coordinator(s)**

The Primary Emergency Coordinator (EC) is P.C. Lall (or designated personnel), U.S. EPA OSC. In the event that P.C. Lall (or designated personnel) is unavailable or unable to perform the duties of the Emergency Coordinator, William (Bill) Poma, EQM Response Manager, will perform the duties of the Emergency Coordinator.

The EC must determine that a release has occurred; identify the spilled material; account for human safety; determine if the spill is significant or insignificant for both human safety and environmental protection, notify the proper emergency response personnel and return the site to a steady state. If the spill is insignificant, the EC should initiate cleanup through the use of proper personal protective equipment (PPE) and materials to manage and clean up the spill. For significant spills, EC duties are listed in Section 4 of this plan.

The Emergency Coordinator's role and duties are:

1. In case of an actual or imminent release, the EC must immediately

- a. Alert the site personnel of the release, and initiate START & ERRS contractor response
  - b. Report the release to local and state agencies, and
  - c. Notify designated local and state response agencies, when additional help is needed to mitigate the release.
2. In case of a fire, explosion or a release, the EC must immediately determine the source, amount and the extent of the release, fire or explosion.
3. The EC must assess possible hazards to human health and the environment that may result from the release, fire, or explosion such as toxic, irritating or asphyxiating gases or chemical runoffs or weakened structures (roof, walls, etc.)
4. If the EC determines that the site had a release, fire, or explosion that could actually or potentially threaten the human health and the environment, then the EC should immediately take mitigative actions and also make appropriate notifications as follows:
  - a. If EC determines that evacuation of local areas may be advisable, then the EC must immediately notify appropriate local authorities. The EC must be available to help appropriate officials decide whether local areas should be evacuated, and;
  - b. The EC must immediately notify the National Response Center (NRC) by calling 1-800-424-8802. When calling the NRC, the following information should be reported:
    - a) Name and telephone number of the reporter;
    - b) Name and address of the Site;
    - c) Time and type of the incident (release, fire, explosion)
    - d) Name and quantity of released materials, based on the best available information;
    - e) The extent of injuries, if any, and;
    - f) The possible hazards to human health and/or the environment
5. During an emergency, the EC must take all reasonable measures necessary to ensure that releases, fires, and explosions do not occur or reoccur or spread to other areas where hazardous materials or wastes are located. These measures may include stopping all activities, collecting and containing release materials and run-offs, and removing or isolating materials which may not be involved in the incident to minimize the impact of the incident.
6. If the site activities are stopped because of the emergency incident, the EC or designated personnel must monitor for leaks, pressure buildups, gaseous generations, or ruptures in valves, pipes, and other equipment as appropriate.
7. Soon after an emergency, the EC must provide for treating, storing, or disposing of contained or containerized waste/release material, contaminated soil/surface water or any other material resulting from the release incident

8. The EC must ensure that:

- a. No waste that is incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed, and;
- b. All emergency equipment listed in the contingency plan is cleaned, replaced as appropriate and fit for reuse before site activities are resumed

**2.2 Authority to Commit Resources**

OSC P.C. Lall (or designated personnel) has the authority to expend funds for a mitigative action in the event of an incident release at the S&K Hand Tools Site. The OSC is the Primary EC and is thoroughly familiar with the Site Contingency Plan, Site Layout, operations and removal activities, material handling and characteristics and location of records.

**3.0 IMPLEMENTATION**

The Site Contingency Plan will be implemented if an actual or potential incident involving a release, fire or explosion, threatens human health and/or the environment. The EC has the authority to make all decisions for taking mitigative actions.

This Site Contingency Plan is designed to provide necessary actions and commit all resources to protect human health and the environment. The degree of the seriousness regarding an incident will depend on the type, amount and location of the material involved. Outlined below are potential emergencies that might require implementation of the Site Contingency Plan.

**3.1 Spills**

- A spill from the loading or unloading of debris or other hazardous liquids contained therein within the property boundaries, but the material came in contact with the soil that could then leach into the groundwater causing aquifer contamination
- A spill from the rupture of a fuel or a hydraulic line in heavy equipment on-site, but the material came in contact with soil that could leach into the groundwater causing aquifer contamination
- A spill that could not be contained within the site, or on site property resulting in off-site soil contamination and/or ground or surface water contamination
- A spill of hazardous material or hazardous waste containing a chemical that has a Reportable Quantity (RQ) under Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

Spills on-site will be contained by using absorbents such as sawdust or soil, and/or containment booms on the affected areas. The used absorbent will be collected in a container for proper transportation and disposal at a U.S. EPA approved waste disposal facility.

**3.2 Fires**

- A fire which could cause the release of smoke or fumes from waste materials

- A fire that if allowed to spread could ignite other materials or cause heat induced explosions
- A fire that could spread to off-site areas
- A fire from either inside the building or from surrounding properties which could ignite other materials or cause heat induced explosions.

The EC will rely on the Defiance and South Richland Fire Departments for fire emergencies that exceed the internal capabilities of Site personnel

BR personnel are trained in the operation of hand held fire extinguishers, which will be located in the hot-zone and/or in the support zones on the site as well as in the cabs of heavy equipment. In addition to this, the BR personnel are trained in the use of heavy equipment which could be used to move inert soil materials for placement on fires. This ensures quick and easy extinguishment by use or an excavator to immediately cover an area which may be impacted by a fire. All personnel working on-site will be instructed to notify their supervisor in the event of a fire in their work area.

### **3.3 Explosions**

All personnel working on-site will be instructed to notify staff in the immediate area and a supervisor in the event of one of the following situations:

- An imminent danger exists that an explosion could occur, resulting in a safety hazard
- An imminent danger exists that an explosion could ignite other waste at the site or nearby areas
- An explosion has occurred on the site

## **4.0 PROCEDURES**

Listed below are the personnel actions that may be required during an incident involving waste release that could require implementation of the Site Contingency Plan.

### **4.1 Discoverer's Plan of Action**

If an emergency situation develops, the person that discovered the release, fire or explosion, is to notify personnel working in the immediate area and then contact the supervisor and provide the following information:

- a) Their name;
- b) Location of emergency;
- c) Any injuries that have occurred;
- d) Types of materials or waste involved;
- e) Extent of damage or danger, and;
- f) Whether the material or waste has migrated off-site

#### **4.2 Supervisor's Plan of Action**

Upon notification of an emergency situation involving hazardous material or waste, the supervisor should gather the following information:

- a) Caller's name;
- b) Location of emergency;
- c) Any injuries that have occurred;
- d) Types of materials or waste involved;
- e) Extent of damage or danger, and;
- f) Whether the material or waste has migrated off-site

The supervisor is to evaluate the situation and determine if it requires implementation of the Site Contingency Plan measures or if the situation could be managed internally. Internal response will be limited to "incidental" releases/spills. The supervisor must assess human and or environmental hazards to determine the next course of action. The supervisor will then immediately notify the OSC.

The supervisor will describe the incident and the corrective actions taken, including the amount of clean up materials generated. In general, significant spills, fires or explosions mandate the implementation of the Site Contingency Plan.

Under situations where in the supervisor is unsure of the incident release, the site BC should be immediately contacted for assistance. The OSC is the Primary EC and should be contacted first. If the Primary EC is unavailable, Secondary EC, the RM, should be contacted.

##### **4.2.1 Injury and Ambulance Procedures**

If the ambulance service is required, the following steps have to be followed:

1. Radio main trailer (Support Zone Trailer) and inform them of the ambulance request
2. Deploy site personnel to the front of the site at 135 Hickory Street to escort the ambulance to the location of the injured person(s).

#### **4.3 Emergency Coordinator's Plan of Action**

The EC will determine if outside assistance is needed. If a situation is life threatening, the EC will then contact the Defiance/South Richland Fire Department and Defiance Police Department. These organizations can be activated with a single 911 call. When further assistance with cleanup and containment is required, the EC will locate additional local companies for cleanup.

The EC has to take appropriate actions to ensure that the fire, explosion, or spill does not occur or reoccur or spread to other areas. This may involve moving materials not involved in the incident to establish a firebreak.

When a release material exceeds the RQ or enters a sewer or storm water drain, the EC must contact the following organizations and notify them of the release:

1. National Response Center at 1-800-424-8802 (if RQ is exceeded)
2. Ohio EPA Emergency Response Unit at 1-800-282-9378
3. Defiance County Emergency Management Agency at 1-419-782-1130

If a material was released and has not exceeded its RQ but crossed the Site boundaries and got in contact with the soils on the adjoining property, then the EC must contact the following organizations:

1. Defiance County Local Emergency Planning Committee at 1-419-782-1130

After necessary notifications, it is important that the caller document the time, date, and the name of the person(s) at the agency who received the call.

Immediately after abating the emergency situation, the EC must ensure that the following is completed:

- A) All emergency equipment used in decontaminated/cleaned and checked for readiness for their intended use before resuming other operations
- B) The parties involved in the incident will be interviewed by the EC, who will then oversee the correction of any deficiencies discovered in the Site Contingency Plan as a result of the response.

## **5.0 EMERGENCY EQUIPMENT**

### **Communication Capabilities**

All workers at the S&K Hand Tools-RV Site will carry cell phones which will be used by personnel responding to the emergency situation and will also be used to provide instructions on evacuations, etc. Personnel in the Support/Office Trailer(s) also carry cell phones which can be used to alert the Defiance/South Richland Fire Department.

### **Fire Control Equipment**

For rapid response to fires, hand held fire extinguishers are located in the on-site trailer(s) and on heavy equipment.

**Capabilities:** Respond to small and medium-sized fires

### **Spill Control Equipment**

A spill kit will be located in on-site trailer that can be utilized on any spill areas. The kit consisting of absorbents and equipment is readily available to clean and absorb spilled chemicals.

**Capabilities:** Response, containment, and cleanup of routinely handled spilled material

### **Personnel Protective Equipment (PPE)**

Personnel working at the Site may require various levels of PPE gear to fulfill the removal action. All site personnel are appropriately trained and certified to wear various PPE gears. A decontamination area is established within the contamination reduction zone (CRZ)

through which all site workers exiting the hot zone must pass and decontaminate their PPE gear.

All visitors must utilize at least Level D PPE and stay outside the CRZ. Extra equipment is located in the support/equipment trailer. The site PPE policy is clearly posted in the main trailer (Support/Office Trailer) above the visitor sign in sheet.

**Capabilities:** Provide protection to personnel during work activities.

#### First Aid Kits

Three (3) first aid station kits are situated in two locations on-site. Two are located in the Support Trailer(s) and one is located in the CRZ/decontamination area.

**Capabilities:** These first aid kits/stations are stocked with articles for the treatment of minor injuries, etc.

All emergency equipment listed above is inspected and maintained on a scheduled basis by either on-site personnel or outside agencies.

## 6.0 COORDINATION AGREEMENTS

The Defiance and South Richland Fire Departments (D/SRFDs) are the lead agencies responding to emergencies at the site because of their jurisdiction, knowledge of the site area and because of their equipment and capabilities. The D/SRFDs will be provided a copy of the Site Contingency Plan and briefing on the Site Contingency Plan will be made available to all cooperating agencies. The D/SRFDs have been advised of the types of products, materials, waste, and their respective amounts present on-site and the removal action activities being undertaken by U.S. EPA. The lead contact at the DFD is Fire Chief David Schmaltz and the lead contact at the SRFD is Fire Chief Bob Lehman. In the event of a fire, either David Schmaltz or Bob Lehman will remain at their lead responding capacity until such time either fire department official relinquishes the command to another qualified individual.

The Defiance Police Department's help will be sought for crowd control, security, and evacuation assistance, should it become necessary. The lead contact for the Defiance Police Department is Chief of Police Timothy Tobias. Chief Tobias will be notified if additional assistance is needed during a response. A copy of the Site Contingency Plan will be provided to the Defiance Police Department.

Mercy Hospital of Defiance is the closest hospital to the site and they will be advised of the site removal activities so that they can plan on responding to the types of injuries that may occur from an incident. Local ambulance or Emergency Medical Service (EMS) personnel will be summoned to transport injured personnel to the hospital and provide onsite triage, if necessary.

## **7.0 EVACUATION PLAN**

All personnel evacuation will occur in the event threatening personnel safety as determined by the EC. The EC has the authority to call for the evacuation of the entire site or specific work areas only. A map of potential evacuation routes is found in Appendix A

Site personnel have been instructed to immediately shut down the equipment and proceed to the primary exit route for their work area. If the call for evacuation identifies a primary route as being blocked or in the incident area, the site personnel have been instructed to use an alternate evacuation route. Once outside of the site, the site personnel have been instructed to assemble in one of the two assembly points that are located at the Site trailer(s) west of the facility and the gate entrance at the intersection of Hickory and Hopkins Street.

Assembly Area A is located west of the Site building at the Site trailer(s).

Assembly Area B is located northeast of the Site building at the intersection of Hickory and Hopkins Street.

A head count of the personnel will be conducted by the EC and the emergency responders will be advised of any missing personnel.

**NO OTHER SITE PERSONNEL WILL BE ALLOWED TO ENTER THE SITE TO LOOK FOR MISSING PERSONNEL**

## **8.0 VANDALISM/WORK PLACE VIOLENCE**

This procedure covers the steps to be taken in the event of vandalism/work place violence or a bomb threat that may endanger site personnel.

1. The individual receiving the bomb threat or who observes potentially life threatening workplace violence shall immediately notify the OSC or next highest ranking personnel at the site, who in turn will contact the local police department by dialing 911.
2. The OSC or the highest ranking personnel shall determine the need for evacuating the site, and as determined necessary, shall initiate evacuation procedure
3. No person shall be permitted to conduct a bomb search or to physically confront any violent aggressor.
4. All personnel shall evacuate the site and meet in the designated assembly area(s)

## **9.0 SEVERE WEATHER**

This procedure covers the steps to be taken in the event of a threat of tornado and/or other severe weather that could jeopardize personnel safety. Internet access is located in the Site trailer and is used regularly to monitor weather by office/support zone personnel.



1. The individual who notices severe weather threat shall immediately notify the OSC or the RM, who as appropriate, will initiate actions to secure the site and protect site personnel
2. The EC will delegate one of the site personnel to monitor the weather through radio, internet or other such available media to determine the severity, location and path of the weather pattern.
3. If the evacuation of the site is necessary, all personnel will follow the directions given by the EC or by the highest-ranking ER personnel. All personnel will exit the work areas calmly and orderly, and proceed to the designated Assembly Areas(s) outlined in Section 7. Incident specific instructions will also be provided during such evacuations as determined by the lead evacuator. Police and Fire Department buildings can be used as tornado shelters.
4. Except for the personnel assigned to secure the site, all other personnel will leave the site and go to the shelter area and wait there until favorable weather conditions prevail. Personnel who are assigned to secure the site shall complete their assignments and then go to the shelter.

#### **10.0 REQUIRED REPORTS**

The OSC shall document any situation requiring the implementation of the Site Emergency/Contingency Plan in the Pollution Report.

#### **11.0 AMENDMENTS TO THE SITE EMERGENCY RESPONSE PLAN**

The OSC will be notified of any changes in removal operations, or addition of new operations that require revision of an emergency action plan or evacuation. The purpose of this notification is to revise the Site Contingency Plan and evaluate the goals for the elimination or reduction of environmental threats.

1. The OSC will meet with the RM
2. The potential spills and environmental releases will be discussed and listed. This will include:
  - a. Chemicals to be used in new operation(s) and revise any that are not currently in use at the site;
  - b. Physical hazards associated with the new operation(s), such as confined spaces, stored energy hazards; and
  - c. Determination of most likely chemical or fire incidents to occur in the area.
3. Revise the Site Contingency Plan to reflect new risk evaluation. This will include:
  - a. Addition of new wastes/chemicals to the plan; and
  - b. Addition of special precautions or procedures.
4. The Site Contingency Plan will be revised whenever there is a change in regulations, emergency coordinators, or in emergency equipment.

All affected parties will be notified of the changes. If changes are minor, or are confined to appendices, an up-date to the current plan will be distributed to all parties. If the

changes are major, the plan will be written and distributed to all agencies and personnel identified in Appendix B.

## **APPENDIX A: FIGURES**

**APPENDIX B: EMERGENCY CONTACT NUMBERS**

EMERGENCY COORDINATORS

*Primary Emergency Coordinator:*  
P.C. Lall (or designated personnel)  
On Scene Coordinator  
U.S. EPA Region 5  
734-740-9015 (cell)  
734-692-7685 (office)  
9311 Groh Road  
Grosse Ile, MI 48138  
Lall.Partap@epamail.epa.gov

*Alternate Emergency Coordinator:*  
Bill Poma  
EQM Response Manager  
Environmental Quality Management  
513-659-5875 (Cell)  
513-825-7500 (Office)  
1800 Carillon Boulevard  
Cincinnati, OH 45240  
bpoma@eqm.com

HOSPITAL

Mercy Hospital of Defiance  
(419) 782-8444  
1404 East 2<sup>nd</sup> Street  
Defiance, OH 43512

24-HR CONTACTS

U.S. EPA Region 5	312-353-2318
National Response Center	800-424-8802
Centers for Disease Control	770-448-7100
AT&F (Explosives Hotline)	888-283-2662
Chemtrec:	800-262-8200
Poison Control Center	800-222-1222

STATE

Ohio Department of Environmental Response and Revitalization  
(614) 644-2924  
50 West Town Street, Suite 700  
Columbus, OH 43215  
epaderweb@epa.state.oh.us

COUNTY

Julie Rittenhouse  
Defiance County Local Emergency Planning Committee (LEPC)  
22491 Mill Street  
Defiance, OH 43512  
Phone: (419) 782-1130  
Email: ema@defiance-county.com

CITY

Chief of Police Timothy Tobias  
Defiance Police Department  
324 Perry Street  
Defiance, OH 43512  
(419) 784-5050

Fire Chief David Schmaltz  
Defiance Fire Department  
Defiance, OH  
Station: (419) 782-2771

Fire Chief Bob Lehman  
South Richland Fire Department  
South Richland, OH  
Station: (419) 782-3811  
Cell: (419) 770-0920

# FAX RX Result Report



MFP

TASKalfa 3050ci

Firmware Version 2LC\_2F00.007.009 2013.11.27

06/23/2014 14:29  
[2LC\_1000.009.001] [2K9\_1100.002.001] [2LC\_7000.007.009]

Job No.: 022057      Total Time: 0°09'18"      Page: 025

## Complete

Document:      **doc02205720140623141929**

No.	Date and Time	Destination	Times	Type	Result	Resolution/ECM
001	06/23/14 14:19	<b>4197823714</b>	0°09'18"	FAX	OK	200x100 Normal/Off

**SK HAND TOOL CORPORATION**



**PCB/DERR**

**Defiance Co.**



# FTTS TRACKING SYSTEM INPUT DOCUMENT FOR INSPECTIONS

INSPECTION DATE: <u>6-4-96</u>		INSPECTOR NUMBER: <u>OH029</u>	INSPECTION SEQ: _____
LEGISLATIVE IND: _____		INVESTIGATION TYPE: <u>6PS</u>	
REGION OR STATE: <u>OH</u>		INSPECTOR NAME: <u>WILDER</u>	
REASON FOR INSPECTION: <u>NSS</u>		REFERRAL TYPE: _____	FILE NUMBER: _____
DATE RPT RECV: _____	WARRANT REQUIRED: _____	NUMBER OF SAMPLES: <u>0</u>	CBI: _____
NUMBER OF SCHOOLS: _____	SCHOOL TYPE: _____	FACILITY FUNCTION: <u>US</u>	
EPA ESTAB: _____	PROD REG #: _____	FED FACILITY: _____	
REMARKS (50): _____			
SITE NAME: <u>SK TOOLS</u>			
SITE ADDRESS: <u>135 Hickory St</u>			
SITE CITY: <u>Defiance</u>		STATE: <u>OH</u>	ZIP: <u>43512</u>
SITE DUNS: _____		SITE COUNTY: _____	
SITE SIC CODES: <u>MF</u> <u>CM</u>			
PARENT CO NAME: <u>EACOM</u>			
PARENT CO ADDRESS: <u>?</u>			
PARENT CO CITY: <u>?</u>		STATE: <u>?</u>	ZIP: _____
MEDIA EXPERT: _____		DATE TO MEDIA EXPERT: _____	

**INVESTIGATION TYPE:**  
 6CF Section 6 Chlorofluorocarbons  
 6DX Section 6 Dioxin  
 6PA Section 6 PCB AARP Conducted  
 6PF Section 6 PCB Federal Conducted  
 6PS Section 6 PCB State Conducted

**REASON FOR INSPECTION:**  
 FCA For Cause, Associated  
 FCD For Cause, Disposal  
 FCF For Cause, Follow-up  
 FCG For Cause, Government  
 FCH For Cause, Headquarters  
 FCP For Cause, Private Citizen/  
 Press Complaint  
 FCR For Cause, Regulated Community  
 Complaint  
 FCV For Cause, Violation  
 NSA Neutral Scheme, Associated  
 NSF Neutral Scheme, Follow-Up  
 NSH Neutral Scheme, Headquarters  
 NSI Neutral Scheme Indian Tribe  
 NSR Neutral Scheme Region  
 NSS Neutral Scheme State  
 OVR S/C Overview Inspection  
 SCD Secondary Investigation

**FACILITY FUNCTION:**  
 BK Broker  
 CL Conveyor (Hauler)  
 IA Alternative Methods  
 IH High Efficiency Boilers  
 IM Permitted Disposer  
 Incinerators  
 IL Landfills  
 DM Dredge/Sludge Materials  
 DP Disposer (Non-permitted)  
 DR Research & Development  
 DT Distributor  
 LB Laboratory  
 MI Manufacturer/Importer  
 MN Manufacturer  
 PC Processor  
 PS Secondary Processor  
 PT Port of Entry  
 ST Storer  
 US User, Scrap Yard,  
 Electrical Man., and  
 Repair

**SITE SIC CODES:**  
 BK Broker  
 CB Commercial Buildings  
 CH Chemicals  
 CV Conveyor (Hauler)  
 DP Disposal-Permitting  
 DS Disposal-Spills  
 EM Electric Equipment Manuf.  
 and Repair  
 EU Electric Utilities  
 FF Food and Feed  
 GF Government, Federal  
 GL Government, Local  
 GM General Manufacturing  
 GS Government, State  
 MF Metal Forming  
 SS Scrap and Salvage  
 ST Storer  
 OT Other

RETURN TO: \_\_\_\_\_

ENTERED FTTS: \_\_\_\_\_

3-11-97

100 PM

Left Boden - 54 Tools -

- Name plate Lgo for ~~reformer~~ - Tested -

- Lgo on PCB capacitors - Pole - (3)

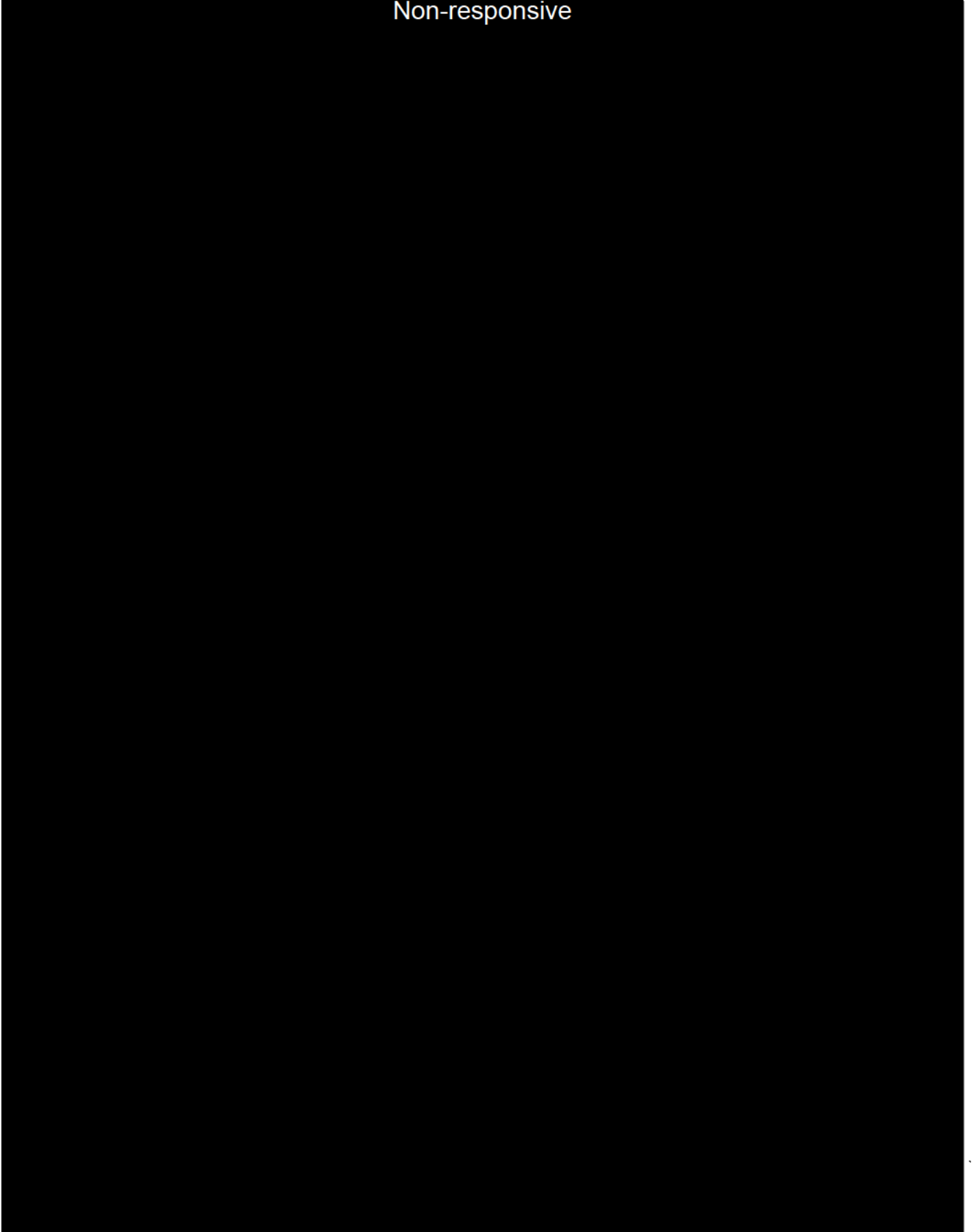
344 galls

Sign Asbestos Filled - attached to reformer -

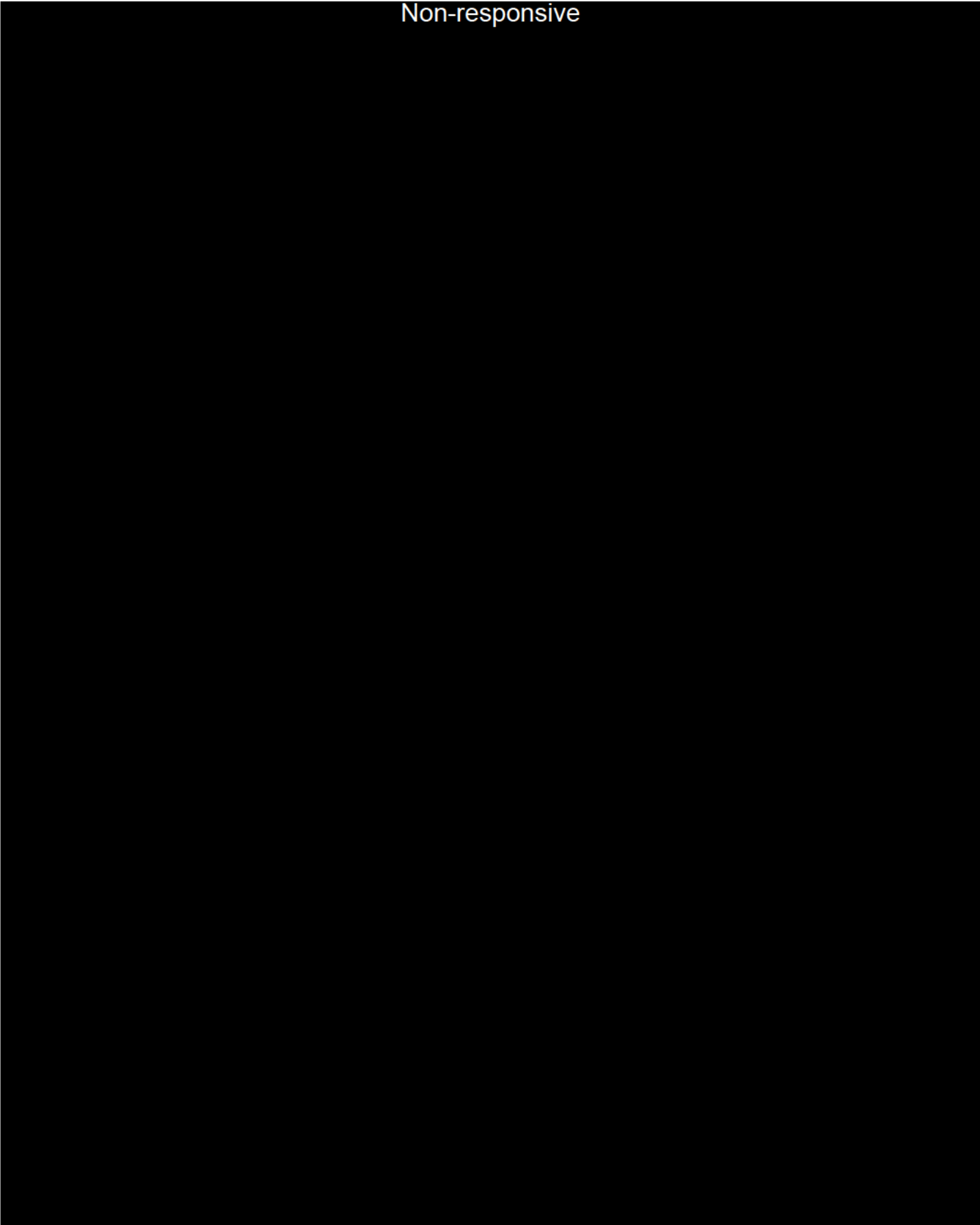
SIN# 78004 - Hills Cleaners 2500 KVA

Class 0A = ASK on name plate

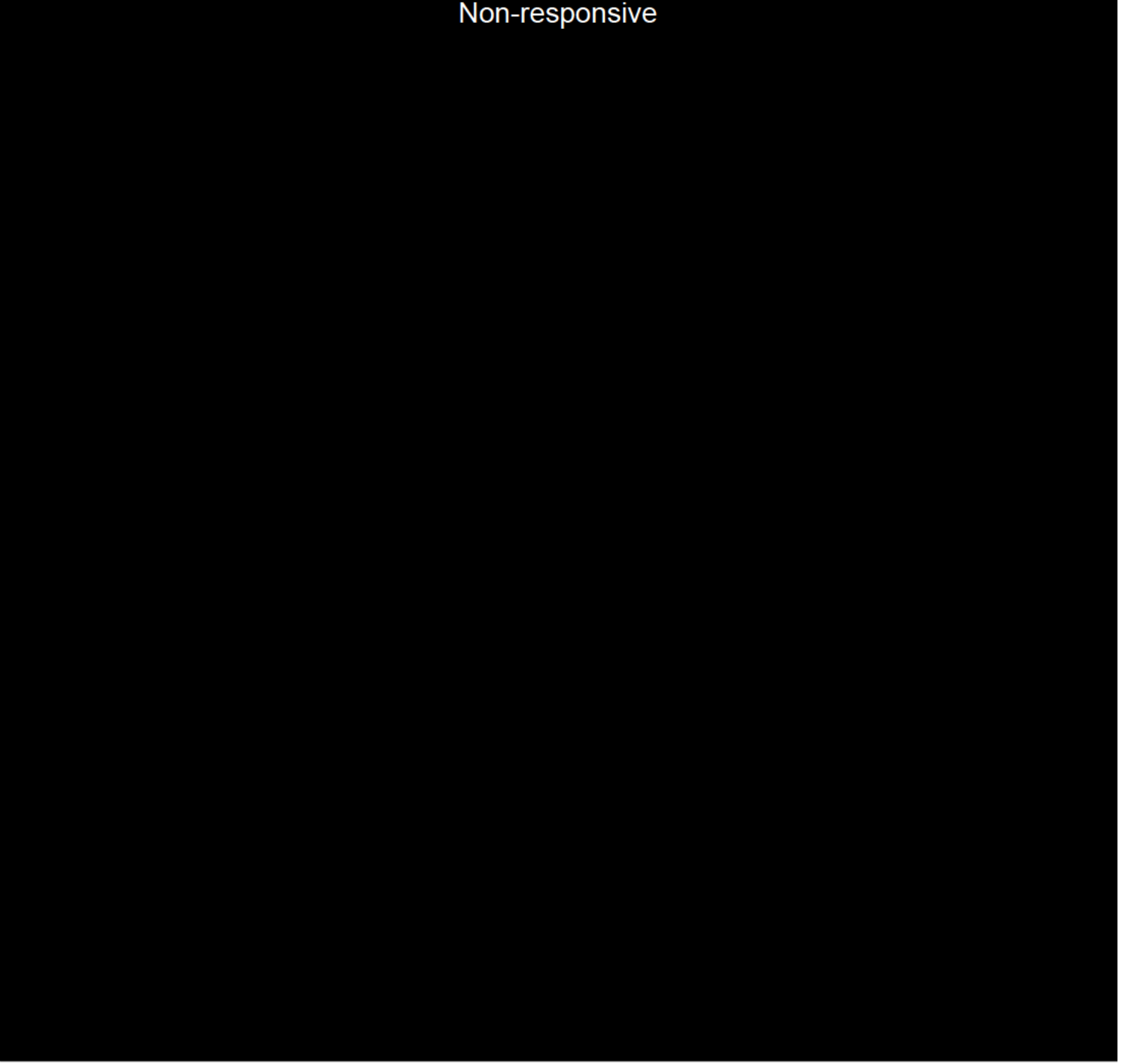
Non-responsive




Non-responsive



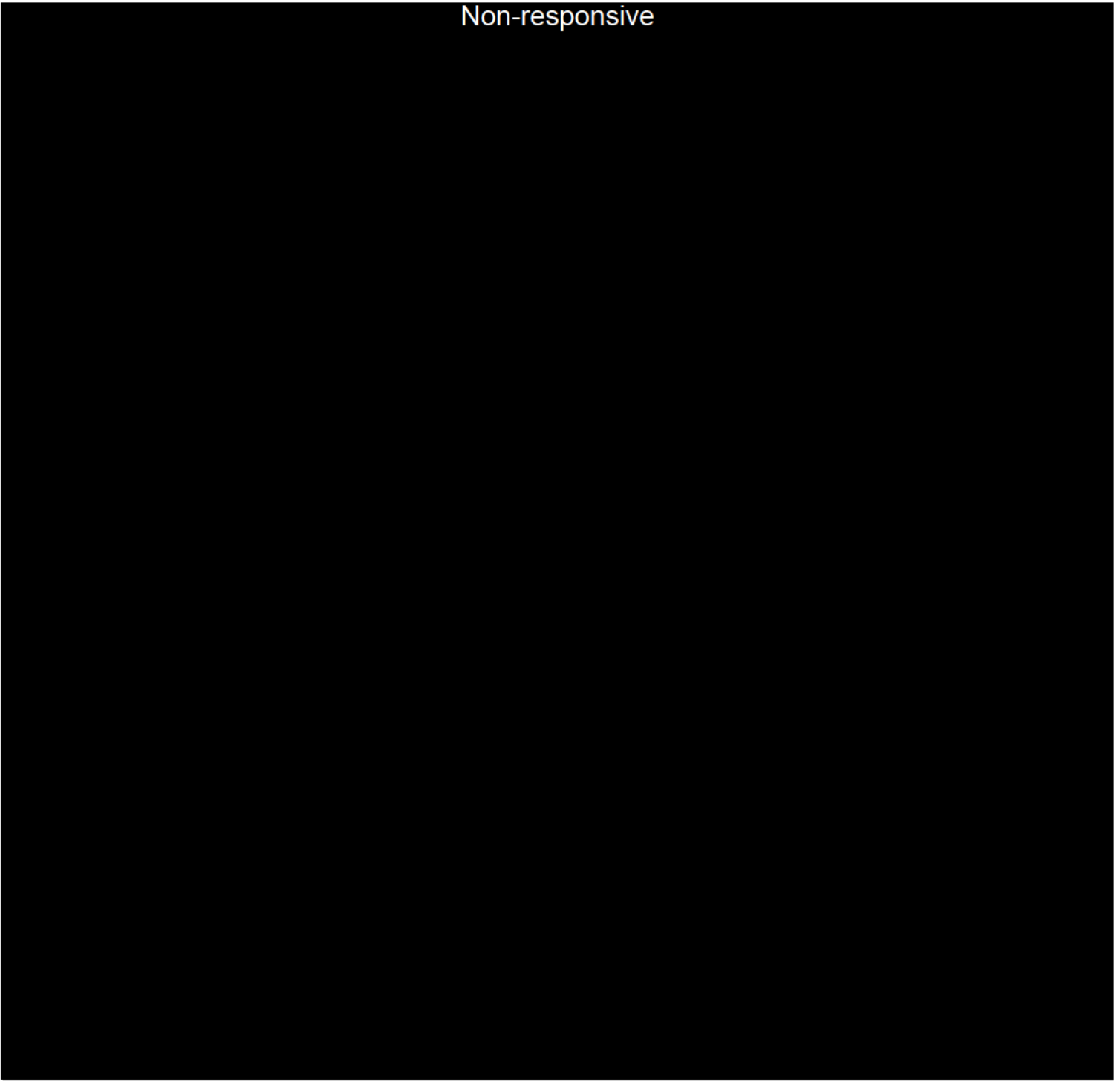
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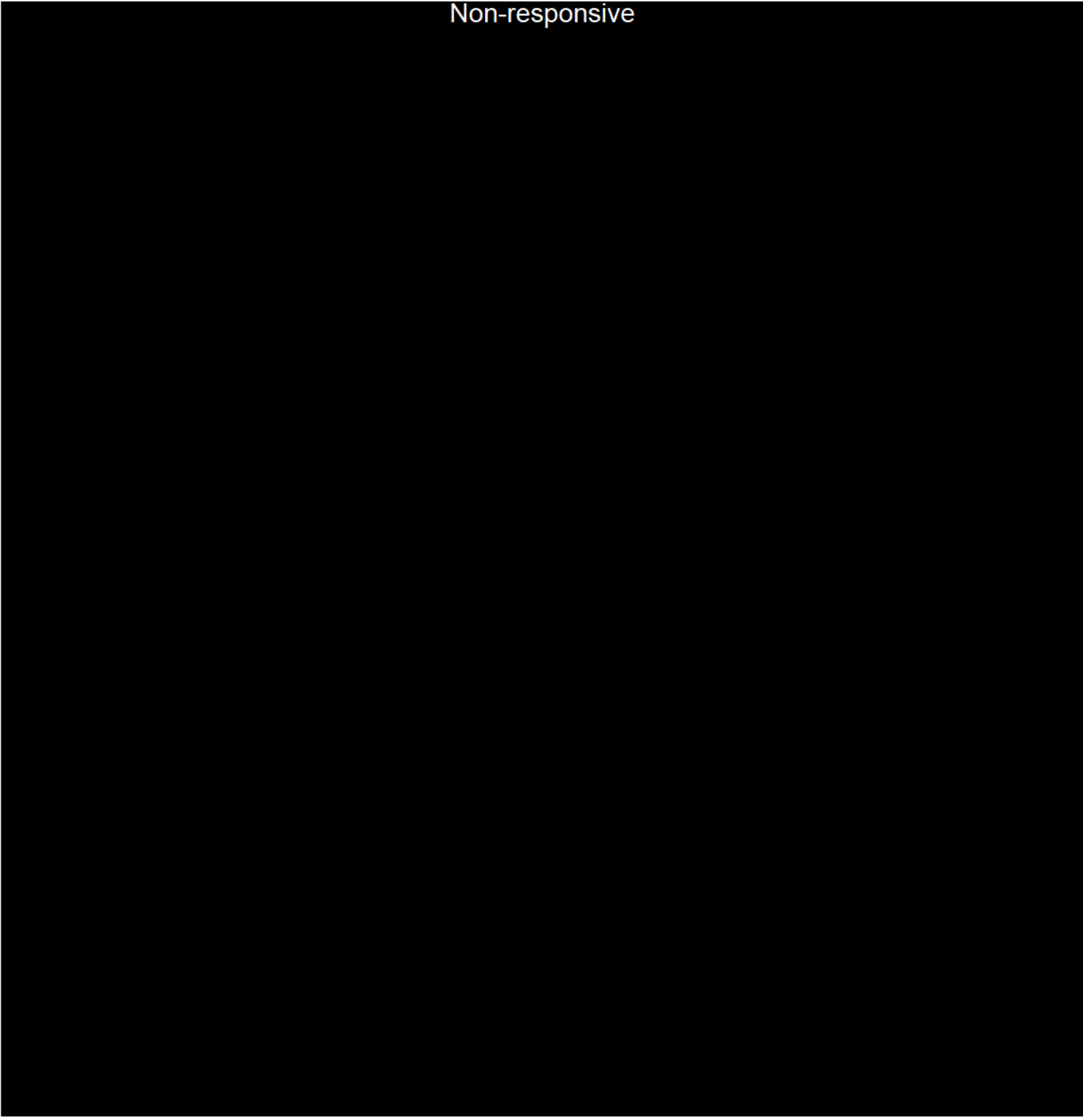
Non-responsive



Non-responsive



Non-responsive





**REPORT ON INSPECTION TO DETERMINE  
COMPLIANCE WITH THE PCB DISPOSAL  
AND MARKING REGULATIONS**

June 4, 1996

SK Hand Tool Corporation  
135 Hickory Street  
Defiance, OH 43512

**PERFORMED BY:**

**OHIO ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF EMERGENCY AND REMEDIAL RESPONSE  
P.O. BOX 1049, 1800 WATERMARK DRIVE  
COLUMBUS, OHIO 43216-1049**

**AS AUTHORIZED UNDER THE  
U.S. EPA PILOT TSCA COOPERATIVE  
ENFORCEMENT AGREEMENT PROGRAM**

## PCB COMPLIANCE INSPECTION REPORT

### I. OBJECTIVE

The inspection was conducted to document the facility's handling, storage and disposal practices and to determine its compliance with the PCB Regulations, 40 CFR Part 761, as published in the Federal Register of May 31, 1979 and as amended.

### II. COMPANY IDENTIFICATION

SK Hand Tool Corporation  
135 Hickory Street  
Defiance, OH 43512

#### RESPONSIBLE OFFICIAL

Jeffrey O. Baden, Engineering Supervisor

### III. DATE OF INSPECTION

June 4, 1996

### IV. PARTICIPANTS

#### Company

Jeffrey O. Baden, Engineering Supervisor  
Roger Bennett, Chief Electrician

#### Ohio EPA

Isaac B. Wilder, Environmental Specialist II (author)

### V. COMPANY BACKGROUND ☒ PCBs ☐ No PCBs discovered

#### Parent company:

SK Hand Tool Corporation is wholly owned by FACOM a French headquartered company. The facility is 260,00 square feet in size and employs 150 persons. The facility manufactures hand tools. The products are distributed world wide.

The facility brings in raw steel bars. The bars are forged to a rough shape. The forgings are then ground and machined to final shape and polished. The also nickel-chrome plates the finished product.

#### Basis for selection:

Neutral Inspection Scheme.

### VI. INSPECTION SUMMARY

#### A. Opening Conference

The inspector(s) met with company officials as indicated in Section II, presented TSCA Inspection Credentials, explained the purpose of the inspection, and presented for signature the TSCA inspection Forms as indicated below:

☒ Notice of Inspection

☒ TSCA Confidentiality Notice

☐ Receipt for samples/Documents collected

These documents are enclosed as Attachment A and were signed by the Responsible Official referenced above.

**B. Circumstances Applicable to this Inspection**

- |   |  |
|---|--|
| <input type="checkbox"/> Manufacturing      | <input type="checkbox"/> Distribution                  |
| <input type="checkbox"/> Processing         | <input checked="" type="checkbox"/> Use/Authorizations |
| <input checked="" type="checkbox"/> Marking | <input type="checkbox"/> Disposal                      |
| <input type="checkbox"/> Storage            | <input checked="" type="checkbox"/> Recordkeeping      |
| <input type="checkbox"/> None of the Above  |  |

**C. CITATION**

- ☐ Not Applicable  
☒ Citation Issued on: June 4, 1996  
☒ Response received on: July 22, 1996

**D. CLOSING CONFERENCE**

☒ The inspector(s) explained the three possible outcomes of the inspection and informed the company officials that a final determination and notification would be made by the USEPA Region 5 Office.

**VII. SAMPLES/ PHOTOGRAPHS/ DOCUMENTS**

- ☒ None Taken  
☐ See attachments as listed

**VIII. ATTACHMENTS**

**A. TSCA Documents**

1. Notice of Inspection
2. TSCA Inspection Confidentiality Notice
3. Field Citation

**B. Company Documents**

1. Photographs showing proper marking of PCB transformer and 3 PCB capacitors.
2. Copy of letter notifying local Fire Dept, dated July 15, 1996.

**IX. INSPECTOR'S COMMENTS**

- |  |   |
|--|---|
| <input type="checkbox"/> Manufacturing (761.20)      | <input type="checkbox"/> Distribution (761.20)                  |
| <input type="checkbox"/> Processing (761.20)         | <input checked="" type="checkbox"/> Use/Authorizations (761.30) |
| <input checked="" type="checkbox"/> Marking (761.40) | <input type="checkbox"/> Disposal (761.60)                      |
| <input type="checkbox"/> Storage (761.65)            | <input checked="" type="checkbox"/> Recordkeeping (761.180)     |
| <input type="checkbox"/> Other                       |   |

**A. Manufacturing (761.20)**

The facility is not a manufacturer of PCBs.

**B. Distribution (761.20)**

The facility is not a distributor of PCBs.

**C. Processing (761.20)**

The facility is not a processor of PCBs.

**D. Use/Authorizations (761.30)****1. Electrical Equipment****a. Transformers**

The facility owns one (1) oil filled PCB transformer. The unit is an Allis Chalmers, S/N 78004, 344 gallons/4400 lbs, 200 KVA and 12470 volts. The unit is marked "ASKAREL FILLED". The unit is located in an indoor substation with containment diking. The facility did not have annual inspection records. The facility also owns fifteen (15) pole mounted transformers that are assumed to be PCB contaminated.

**b. Capacitors**

The facility owns 21 PCB capacitors. Three (3) of the capacitors are large high voltage (12470) capacitors. These are located on a pole outside the facility. There are no visible markings on these capacitors. The other capacitors are low voltage (480). Six of the low voltage capacitors are located on two 150 hp. compressor motors. There is a single bank of eight (8), and two (2) banks of two (2) large low voltage capacitors.

**c. Other Electrical Equipment**

The facility owns one (1) oil filled electrical switch.

**2. Hydraulic Equipment**

The facility does not possess any PCB hydraulic equipment. The only pre-TSCA piece of hydraulic equipment is water based. The newer equipment uses HLP-32 or HLP-68 hydraulic oil. The waste oil is handled by Cousin's. They generate approximately 350 gallons of waste oil a year.

**3. Heat transfer Equipment**

The facility has three (3) hardening furnaces. Two (2) use water coils for cooling and the third uses air.

**E. Marking (761.40)**

The facility failed to mark the Allis Chalmers transformer S/N 78004 with the M<sub>L</sub> label. The Transformer had a metal caution plate explaining the dangers of PCBs and what to do if leaking. The substation was properly marked with the M<sub>L</sub> label. A pole with three (3) large high-voltage capacitors was not marked with the M<sub>L</sub> label.

**F. Disposal (761.60)**

The facility has not disposed of any PCB equipment.

**G. Storage (761.65)**

The facility does not maintain a PCB storage facility.

**H. Recordkeeping (761.180)**

The facility did not maintain PCB annual documents. The facility did not notify the local Fire Dept. of the location of their Allis Chalmers PCB transformer S/N 78004.

**I. Other**

NA

Isaac B. Wilder  
Isaac B. Wilder

7/29/86  
Date

ATTACHMENT A



United States Environmental Protection Agency  
Washington, D.C. 20460  
Toxic Substances Control Act  
NOTICE OF INSPECTION

Form Approved  
OMB No. 2070-0007  
Approval Expires 07-31-96

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

1. Investigation Identification			2. Time	3. Firm Name
Date	Inspector No.	Daily Seq. No.		
6-4-96	GH-029	01	10:30	SK Tools
4. Inspector Address				5. Firm Address
Ohio Environmental Protection Agency 1800 WaterMark Drive Columbus, Ohio 43218-1099				135 Hickory St Defiance, OH 43512

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

- ☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to (Check appropriate blocks):

☐ A. Financial data

☐ D. Personnel data

☐ B. Sales data

☐ E. Research data

☒ C. Pricing data

The nature and extent of inspection of such data specified in A through E above is as follows:

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature		Recipient Signature	
<i>Isaac B. Wilder</i>		<i>Jeffrey O. Baden</i>	
Name		Name	
Isaac B. Wilder		JEFFREY O. BADEN	
Title		Title	
Env. Spec. II		Env. Supr.	
Date Signed		Date Signed	
6-4-96		6/4/96	



United States Environmental Protection Agency  
Washington, D.C. 20460  
Toxic Substances Control Act  
TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved  
OMB No. 2070-0007  
Approval Expires 10-31-92

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

1. Investigation Identification			2. Firm Name
Date 6-4-96	Inspector No. 04-029	Daily Seq. No. 01	SK Tels
3. Inspector Name Isaac B. Wilke			4. Firm Address 135 Hickory St Defiance, OH 43512
5. Inspector Address 1800 WaterMark Dr Columbus, OH 43216			6. Chief Executive Officer Name Jeff Baden
			7. Title Engineering Supervisor

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

Emma Avant  
U.S. EPA Region V DRT-14J  
77 West Jackson Boulevard  
Chicago, Illinois 60604

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of the Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:

I have received and read the notice.

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature Jeffrey O Baden		Name	
Name JEFFREY O BADEN		Title	
Title ENGR. SUPV	Date Signed 6/9/96	Address	





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

FIELD CITATION

REPLY TO THE ATTENTION OF:

SK Facility Name

Compliance Inspection  
Date:

135 Hickory St

De Facility Address 43512 City, State

June 4 1976

\* \* \*

This is a formal notification concerning the compliance inspection conducted at the facility named above, pursuant to Section II of the Toxic Substances Control Act (TSCA), 15 U.S.C. Section 2601 et seq. The purpose of the inspection was to assess the facility's compliance with the requirements of the Polychlorinated Biphenyls (PCB) Final Rule, 40 C.F.R. Part 761, and amendments.

Issuance of this citation and receipt of any documentation does not preclude the U.S. EPA from proceeding under TSCA or any other applicable statute and assessing appropriate penalties. Any enforcement action taken by the U.S. EPA after a final evaluation of the inspection report would not be limited to the violations listed in this citation.

It appears that the above-named facility was not in compliance with the requirements of 40 C.F.R. Part 761. The inspection revealed the following violations:

1. ☒ AUTHORIZATIONS  
(Use 761.30)

2. ☒ MARKING  
(761.40)

3. ☐ STORAGE  
(761.65)

4. ☒ RECORDKEEPING  
(761.180)

5. OTHER \_\_\_\_\_

Comments On Violations Cited Above

761.34 use - No annual inspections for Ashland transformer

ALLIS-chalmers - s/n. 78004

761.40 Marking - No M, Label on above transformer

3 Large High Voltage Capacitors not Marked

761.180 - No annual Documents, No Fire department notification

CITATION

DOCUMENTATION REQUIRED TO CORRECT THE ABOVE VIOLATION(S)

761.3d - Not correctable

761.40 - place labels on transformer & capacitor Bank  
and photographs - send to inspector

761.180 - Accurate annual documents - send to inspector  
Send letter to notify local F.D.

Within thirty (30) days of receipt of this Field Citation this facility must submit the requested documentation to show that the violation(s) has/have been corrected. The documentation must be submitted to:

Inspector's Name Ohio EPA - CEPPS

Address 1800 WaterMark Drive/P.O. 1049

City, State Columbus, Ohio 43266-0149

If you have questions concerning this inspection or this Field Citation, please call the inspector at (614) 644-3067

Jeff Radem 6/4/86  
Issued To/Received By Date

Charles B. Wilder 6-4-86  
Inspector's Signature Date

ATTACHMENT B





DEPT. OF CHEMICAL  
ENVIRONMENTAL PROTECTION  
& FIRE DEPARTMENT

**SK HAND TOOL CORPORATION**

135 Hickory Street  
Defiance, OH 43512  
(419) 784-1122  
FAX (419) 782-1236

96 JUL 02 PM 12:03

RECEIVED

Ohio EPA- PCB UNIT  
1800 Watermark Drive  
P.O. Box 1049  
Columbus, Ohio 43266-0149  
Attn: Mr. Issac B. Wilder

July 16, 1996

Dear Mr. Issac B. Wilder:

Below you will find information relating to the actions taken by SK Hand Tool Corporation (SK) in correcting the areas where we were deficient according to your field citation issued to SK on June 4, 1996.

1. **No annual inspections of our ASKAREL transformer S/N 78004.**  
This Area is not correctable.  
SK will conduct the annual inspections of this transformer starting with the 1996 calendar year.
2. **No PCB labels on the ASKAREL transformer and the 3 large high voltage capacitors located at the beginning of our electric supply.**  
Attached you will find pictures showing the required labels in place.
3. **No annual Documents stating our inventory of PCB containing devices and no proof that the local fire department has been informed that the facility has PCB containing devices.**  
Attached you will find the annual PCB device inventories beginning in 1978.  
Attached you will find the letter which was sent to the local fire department stating that SK has a PCB transformer located in its facility.

If you are in need of any further information please do not hesitate to call.

Jeff Baden  
Engineering Supervisor

ANNUAL PCB LOG  
FOR CALENDAR YEAR  
EPA I.D. NO.

1995

OHD045247350

PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

	BEGINNING OF YEAR		REMOVED FOR DISPOSAL		DISPOSED OF		END OF YEAR	
	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)
PCB ARTICLES IN USE								
A. PAD TRANSFORMERS	1	1093	0	0	0	0	1	1093
B. POLE TRANSFORMERS	22	3080	0	0	0	0	22	3080
C. CAPACITORS	26	35	0	0	0	0	26	35
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
TOTAL	49	4208	0	0	0	0	27	4208
PCB ARTICLES IN STORAGE FOR USE								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. BULK PCBs	0	0	0	0	0	0	0	0
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
E. CONTAINERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0
PCB ARTICLES IN STORAGE FOR DISPOSAL								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. ELECTRIC MOTORS	0	0	0	0	0	0	0	0
D. PUMPS	0	0	0	0	0	0	0	0
E. PIPES	0	0	0	0	0	0	0	0
F. CONTAINERS	0	0	0	0	0	0	0	0
G. ARTICLE CONTAINERS	0	0	0	0	0	0	0	0
H. CLEANUP DEBRIS	0	0	0	0	0	0	0	0
I. OTHERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH



ANNUAL PCB LOG  
FOR CALENDER YEAR  
EPA I.D. NO.

1994  
OHD045247350

PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

	BEGINNING OF YEAR		REMOVED FOR DISPOSAL		DISPOSED OF		END OF YEAR	
	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)
PCB ARTICLES IN USE								
A. PAD TRANSFORMERS	1	1093	0	0	0	0	1	1093
B. POLE TRANSFORMERS	22	3080	0	0	0	0	<del>22</del>	3080
C. CAPACITORS	26	35	0	0	0	0	26	35
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
TOTAL	49	4208	0	0	0	0	27	<del>29</del> 4208
PCB ARTICLES IN STORAGE FOR USE								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. BULK PCBs	0	0	0	0	0	0	0	0
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
E. CONTAINERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0
PCB ARTICLES IN STORAGE FOR DISPOSAL								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. ELECTRIC MOTORS	0	0	0	0	0	0	0	0
D. PUMPS	0	0	0	0	0	0	0	0
E. PIPES	0	0	0	0	0	0	0	0
F. CONTAINERS	0	0	0	0	0	0	0	0
G. ARTICLE CONTAINERS	0	0	0	0	0	0	0	0
H. CLEANUP DEBRIS	0	0	0	0	0	0	0	0
I. OTHERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH

ANNUAL PCB LOG  
FOR CALENDAR YEAR  
EPA I.D. NO.

1993  
OHD045247350

PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

	BEGINNING OF YEAR		REMOVED FOR DISPOSAL		DISPOSED OF		END OF YEAR	
	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)
PCB ARTICLES IN USE								
A. PAD TRANSFORMERS	1	1093	0	0	0	0	1	1093
B. POLE TRANSFORMERS	22	3080	0	0	0	0	22	3080
C. CAPACITORS	26	35	0	0	0	0	26	35
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
TOTAL	49	4208	0	0	0	0	27	4208
PCB ARTICLES IN STORAGE FOR USE								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. BULK PCBs	0	0	0	0	0	0	0	0
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
E. CONTAINERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0
PCB ARTICLES IN STORAGE FOR DISPOSAL								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. ELECTRIC MOTORS	0	0	0	0	0	0	0	0
D. PUMPS	0	0	0	0	0	0	0	0
E. PIPES	0	0	0	0	0	0	0	0
F. CONTAINERS	0	0	0	0	0	0	0	0
G. ARTICLE CONTAINERS	0	0	0	0	0	0	0	0
H. CLEANUP DEBRIS	0	0	0	0	0	0	0	0
I. OTHERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH



ANNUAL PCB LOG  
FOR CALENDAR YEAR  
EPA I.D. NO.

1992

OHD045247350

PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

	BEGINNING OF YEAR		REMOVED FOR DISPOSAL		DISPOSED OF		END OF YEAR	
	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)
PCB ARTICLES IN USE								
A. PAD TRANSFORMERS	1	1093	0	0	0	0	1	1093
B. POLE TRANSFORMERS	22	3080	0	0	0	0	22	3080
C. CAPACITORS	26	35	0	0	0	0	26	35
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
TOTAL	49	4208	0	0	0	0	27	4208
PCB ARTICLES IN STORAGE FOR USE								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. BULK PCBs	0	0	0	0	0	0	0	0
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
E. CONTAINERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0
PCB ARTICLES IN STORAGE FOR DISPOSAL								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. ELECTRIC MOTORS	0	0	0	0	0	0	0	0
D. PUMPS	0	0	0	0	0	0	0	0
E. PIPES	0	0	0	0	0	0	0	0
F. CONTAINERS	0	0	0	0	0	0	0	0
G. ARTICLE CONTAINERS	0	0	0	0	0	0	0	0
H. CLEANUP DEBRIS	0	0	0	0	0	0	0	0
I. OTHERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH

ANNUAL PCB LOG  
FOR CALENDAR YEAR  
EPA I.D. NO.

1991

OHD045247350

PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

	BEGINNING OF YEAR		REMOVED FOR DISPOSAL		DISPOSED OF		END OF YEAR	
	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)
PCB ARTICLES IN USE								
A. PAD TRANSFORMERS	1	1093	0	0	0	0	1	1093
B. POLE TRANSFORMERS	22	3080	0	0	0	0	22	3080
C. CAPACITORS	26	35	0	0	0	0	26	35
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
TOTAL	49	4208	0	0	0	0	27	4208
PCB ARTICLES IN STORAGE FOR USE								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. BULK PCBs	0	0	0	0	0	0	0	0
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
E. CONTAINERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0
PCB ARTICLES IN STORAGE FOR DISPOSAL								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. ELECTRIC MOTORS	0	0	0	0	0	0	0	0
D. PUMPS	0	0	0	0	0	0	0	0
E. PIPES	0	0	0	0	0	0	0	0
F. CONTAINERS	0	0	0	0	0	0	0	0
G. ARTICLE CONTAINERS	0	0	0	0	0	0	0	0
H. CLEANUP DEBRIS	0	0	0	0	0	0	0	0
I. OTHERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH

ANNUAL PCB LOG  
FOR CALENDAR YEAR  
EPA I.D. NO.

1990  
OHD045247350

PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

	BEGINNING OF YEAR		REMOVED FOR DISPOSAL		DISPOSED OF		END OF YEAR	
	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)
PCB ARTICLES IN USE								
A. PAD TRANSFORMERS	1	1093	0	0	0	0	1	1093
B. POLE TRANSFORMERS	22	3080	0	0	0	0	22	3080
C. CAPACITORS	26	35	0	0	0	0	26	35
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
TOTAL	49	4208	0	0	0	0	27	4208
PCB ARTICLES IN STORAGE FOR USE								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. BULK PCBs	0	0	0	0	0	0	0	0
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
E. CONTAINERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0
PCB ARTICLES IN STORAGE FOR DISPOSAL								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. ELECTRIC MOTORS	0	0	0	0	0	0	0	0
D. PUMPS	0	0	0	0	0	0	0	0
E. PIPES	0	0	0	0	0	0	0	0
F. CONTAINERS	0	0	0	0	0	0	0	0
G. ARTICLE CONTAINERS	0	0	0	0	0	0	0	0
H. CLEANUP DEBRIS	0	0	0	0	0	0	0	0
I. OTHERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH



ANNUAL PCB LOG  
FOR CALENDAR YEAR  
EPA I.D. NO.

1989  
OHD045247350

PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

	BEGINNING OF YEAR		REMOVED FOR DISPOSAL		DISPOSED OF		END OF YEAR	
	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)
PCB ARTICLES IN USE								
A. PAD TRANSFORMERS	1	1093	0	0	0	0	1	1093
B. POLE TRANSFORMERS	22	3080	0	0	0	0	22	3080
C. CAPACITORS	26	35	0	0	0	0	26	35
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
TOTAL	49	4208	0	0	0	0	27	4208
PCB ARTICLES IN STORAGE FOR USE								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. BULK PCBs	0	0	0	0	0	0	0	0
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
E. CONTAINERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0
PCB ARTICLES IN STORAGE FOR DISPOSAL								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. ELECTRIC MOTORS	0	0	0	0	0	0	0	0
D. PUMPS	0	0	0	0	0	0	0	0
E. PIPES	0	0	0	0	0	0	0	0
F. CONTAINERS	0	0	0	0	0	0	0	0
G. ARTICLE CONTAINERS	0	0	0	0	0	0	0	0
H. CLEANUP DEBRIS	0	0	0	0	0	0	0	0
I. OTHERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH

ANNUAL PCB LOG  
FOR CALENDAR YEAR  
EPA I.D. NO.

1988

OHD045247350

PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

	BEGINNING OF YEAR		REMOVED FOR DISPOSAL		DISPOSED OF		END OF YEAR	
	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)
PCB ARTICLES IN USE								
A. PAD TRANSFORMERS	1	1093	0	0	0	0	1	1093
B. POLE TRANSFORMERS	22	3080	0	0	0	0	20	3080
C. CAPACITORS	26	35	0	0	0	0	26	35
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
TOTAL	49	4208	0	0	0	0	27	4208
PCB ARTICLES IN STORAGE FOR USE								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. BULK PCBs	0	0	0	0	0	0	0	0
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
E. CONTAINERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0
PCB ARTICLES IN STORAGE FOR DISPOSAL								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. ELECTRIC MOTORS	0	0	0	0	0	0	0	0
D. PUMPS	0	0	0	0	0	0	0	0
E. PIPES	0	0	0	0	0	0	0	0
F. CONTAINERS	0	0	0	0	0	0	0	0
G. ARTICLE CONTAINERS	0	0	0	0	0	0	0	0
H. CLEANUP DEBRIS	0	0	0	0	0	0	0	0
I. OTHERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH

ANNUAL PCB LOG  
FOR CALENDAR YEAR  
EPA I.D. NO.

1987

OHD045247350

PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

	BEGINNING OF YEAR		REMOVED FOR DISPOSAL		DISPOSED OF		END OF YEAR	
	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)
PCB ARTICLES IN USE								
A. PAD TRANSFORMERS	1	1093	0	0	0	0	1	1093
B. POLE TRANSFORMERS	22	3080	0	0	0	0	20	3080
C. CAPACITORS	26	35	0	0	0	0	26	35
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
TOTAL	49	4208	0	0	0	0	27	4208
PCB ARTICLES IN STORAGE FOR USE								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. BULK PCBs	0	0	0	0	0	0	0	0
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
E. CONTAINERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0
PCB ARTICLES IN STORAGE FOR DISPOSAL								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. ELECTRIC MOTORS	0	0	0	0	0	0	0	0
D. PUMPS	0	0	0	0	0	0	0	0
E. PIPES	0	0	0	0	0	0	0	0
F. CONTAINERS	0	0	0	0	0	0	0	0
G. ARTICLE CONTAINERS	0	0	0	0	0	0	0	0
H. CLEANUP DEBRIS	0	0	0	0	0	0	0	0
I. OTHERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH



PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

OHD045247350

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH

ANNUAL PCB LOG  
FOR CALENDAR YEAR  
EPA I.D. NO.

1985

OHD045247350

PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

	BEGINNING OF YEAR		REMOVED FOR DISPOSAL		DISPOSED OF		END OF YEAR	
	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)
PCB ARTICLES IN USE								
A. PAD TRANSFORMERS	1	1093	0	0	0	0	1	1093
B. POLE TRANSFORMERS	22	3080	0	0	0	0	22	3080
C. CAPACITORS	26	35	0	0	0	0	26	35
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
TOTAL	49	4208	0	0	0	0	27	4208
PCB ARTICLES IN STORAGE FOR USE								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. BULK PCBs	0	0	0	0	0	0	0	0
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
E. CONTAINERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0
PCB ARTICLES IN STORAGE FOR DISPOSAL								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. ELECTRIC MOTORS	0	0	0	0	0	0	0	0
D. PUMPS	0	0	0	0	0	0	0	0
E. PIPES	0	0	0	0	0	0	0	0
F. CONTAINERS	0	0	0	0	0	0	0	0
G. ARTICLE CONTAINERS	0	0	0	0	0	0	0	0
H. CLEANUP DEBRIS	0	0	0	0	0	0	0	0
I. OTHERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH



ANNUAL PCB LOG  
FOR CALENDAR YEAR  
EPA I.D. NO.

1984

OHD045247350

PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

	BEGINNING OF YEAR		REMOVED FOR DISPOSAL		DISPOSED OF		END OF YEAR	
	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)
PCB ARTICLES IN USE								
A. PAD TRANSFORMERS	1	1093	0	0	0	0	1	1093
B. POLE TRANSFORMERS	22	3080	0	0	0	0	22	3080
C. CAPACITORS	26	35	0	0	0	0	26	35
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
TOTAL	49	4208	0	0	0	0	27	4208
PCB ARTICLES IN STORAGE FOR USE								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. BULK PCBs	0	0	0	0	0	0	0	0
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
E. CONTAINERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0
PCB ARTICLES IN STORAGE FOR DISPOSAL								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. ELECTRIC MOTORS	0	0	0	0	0	0	0	0
D. PUMPS	0	0	0	0	0	0	0	0
E. PIPES	0	0	0	0	0	0	0	0
F. CONTAINERS	0	0	0	0	0	0	0	0
G. ARTICLE CONTAINERS	0	0	0	0	0	0	0	0
H. CLEANUP DEBRIS	0	0	0	0	0	0	0	0
I. OTHERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH

ANNUAL PCB LOG  
FOR CALENDAR YEAR  
EPA I.D. NO.

1983

OHD045247350

PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

	BEGINNING OF YEAR		REMOVED FOR DISPOSAL		DISPOSED OF		END OF YEAR	
	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)
PCB ARTICLES IN USE								
A. PAD TRANSFORMERS	1	1093	0	0	0	0	1	1093
B. POLE TRANSFORMERS	22	3080	0	0	0	0	22	3080
C. CAPACITORS	26	35	0	0	0	0	26	35
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
TOTAL	49	4208	0	0	0	0	27	4208
PCB ARTICLES IN STORAGE FOR USE								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. BULK PCBs	0	0	0	0	0	0	0	0
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
E. CONTAINERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0
PCB ARTICLES IN STORAGE FOR DISPOSAL								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. ELECTRIC MOTORS	0	0	0	0	0	0	0	0
D. PUMPS	0	0	0	0	0	0	0	0
E. PIPES	0	0	0	0	0	0	0	0
F. CONTAINERS	0	0	0	0	0	0	0	0
G. ARTICLE CONTAINERS	0	0	0	0	0	0	0	0
H. CLEANUP DEBRIS	0	0	0	0	0	0	0	0
I. OTHERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH

ANNUAL PCB LOG  
FOR CALENDAR YEAR  
EPA I.D. NO.

1982  
OHD045247350

PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

	BEGINNING OF YEAR		REMOVED FOR DISPOSAL		DISPOSED OF		END OF YEAR	
	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)
PCB ARTICLES IN USE								
A. PAD TRANSFORMERS	1	1093	0	0	0	0	1	1093
B. POLE TRANSFORMERS	22	3080	0	0	0	0	20	3080
C. CAPACITORS	26	35	0	0	0	0	26	35
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
TOTAL	49	4208	0	0	0	0	27	4208
PCB ARTICLES IN STORAGE FOR USE								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. BULK PCBs	0	0	0	0	0	0	0	0
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
E. CONTAINERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0
PCB ARTICLES IN STORAGE FOR DISPOSAL								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. ELECTRIC MOTORS	0	0	0	0	0	0	0	0
D. PUMPS	0	0	0	0	0	0	0	0
E. PIPES	0	0	0	0	0	0	0	0
F. CONTAINERS	0	0	0	0	0	0	0	0
G. ARTICLE CONTAINERS	0	0	0	0	0	0	0	0
H. CLEANUP DEBRIS	0	0	0	0	0	0	0	0
I. OTHERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH



ANNUAL PCB LOG  
FOR CALENDAR YEAR  
EPA I.D. NO.

1981

OHD045247350

PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

	BEGINNING OF YEAR		REMOVED FOR DISPOSAL		DISPOSED OF		END OF YEAR	
	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)
PCB ARTICLES IN USE								
A. PAD TRANSFORMERS	1	1093	0	0	0	0	1	1093
B. POLE TRANSFORMERS	22	3080	0	0	0	0	20	3080
C. CAPACITORS	26	35	0	0	0	0	26	35
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
TOTAL	49	4208	0	0	0	0	27	4208
PCB ARTICLES IN STORAGE FOR USE								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. BULK PCBs	0	0	0	0	0	0	0	0
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
E. CONTAINERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0
PCB ARTICLES IN STORAGE FOR DISPOSAL								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. ELECTRIC MOTORS	0	0	0	0	0	0	0	0
D. PUMPS	0	0	0	0	0	0	0	0
E. PIPES	0	0	0	0	0	0	0	0
F. CONTAINERS	0	0	0	0	0	0	0	0
G. ARTICLE CONTAINERS	0	0	0	0	0	0	0	0
H. CLEANUP DEBRIS	0	0	0	0	0	0	0	0
I. OTHERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH

ANNUAL PCB LOG  
FOR CALENDAR YEAR  
EPA I.D. NO.

1980  
OHD045247350

PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

	BEGINNING OF YEAR		REMOVED FOR DISPOSAL		DISPOSED OF		END OF YEAR	
	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)
PCB ARTICLES IN USE								
A. PAD TRANSFORMERS	1	1093	0	0	0	0	1	1093
B. POLE TRANSFORMERS	22	3080	0	0	0	0	20	3080
C. CAPACITORS	26	35	0	0	0	0	26	35
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
TOTAL	49	4208	0	0	0	0	27	4208
PCB ARTICLES IN STORAGE FOR USE								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. BULK PCBs	0	0	0	0	0	0	0	0
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
E. CONTAINERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0
PCB ARTICLES IN STORAGE FOR DISPOSAL								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. ELECTRIC MOTORS	0	0	0	0	0	0	0	0
D. PUMPS	0	0	0	0	0	0	0	0
E. PIPES	0	0	0	0	0	0	0	0
F. CONTAINERS	0	0	0	0	0	0	0	0
G. ARTICLE CONTAINERS	0	0	0	0	0	0	0	0
H. CLEANUP DEBRIS	0	0	0	0	0	0	0	0
I. OTHERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH

ANNUAL PCB LOG  
FOR CALENDAR YEAR  
EPA I.D. NO.

1979  
OHD045247350

PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

	BEGINNING OF YEAR		REMOVED FOR DISPOSAL		DISPOSED OF		END OF YEAR	
	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)
PCB ARTICLES IN USE								
A. PAD TRANSFORMERS	1	1093	0	0	0	0	1	1093
B. POLE TRANSFORMERS	22	3080	0	0	0	0	22	3080
C. CAPACITORS	26	35	0	0	0	0	26	35
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
TOTAL	49	4208	0	0	0	0	27	4208
PCB ARTICLES IN STORAGE FOR USE								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. BULK PCBs	0	0	0	0	0	0	0	0
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
E. CONTAINERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0
PCB ARTICLES IN STORAGE FOR DISPOSAL								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. ELECTRIC MOTORS	0	0	0	0	0	0	0	0
D. PUMPS	0	0	0	0	0	0	0	0
E. PIPES	0	0	0	0	0	0	0	0
F. CONTAINERS	0	0	0	0	0	0	0	0
G. ARTICLE CONTAINERS	0	0	0	0	0	0	0	0
H. CLEANUP DEBRIS	0	0	0	0	0	0	0	0
I. OTHERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH



ANNUAL PCB LOG  
FOR CALENDAR YEAR  
EPA I.D. NO.

1978

PLANT: SK HAND TOOL CORPORATION  
ADDRESS: 135 HICKORY STREET  
DEFIANCE, OH 43512

	BEGINNING OF YEAR		REMOVED FOR DISPOSAL		DISPOSED OF		END OF YEAR	
	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)	QUANTITY	WEIGHT OF PCB (kg)
PCB ARTICLES IN USE								
A. PAD TRANSFORMERS	1	1093	0	0	0	0	1	1093
B. POLE TRANSFORMERS	22	3080	0	0	0	0	22	3080
C. CAPACITORS	26	35	0	0	0	0	26	35
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
TOTAL	49	4208	0	0	0	0	27	4208
PCB ARTICLES IN STORAGE FOR USE								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. BULK PCBs	0	0	0	0	0	0	0	0
D. OTHER EQUIPMENT	0	0	0	0	0	0	0	0
E. CONTAINERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0
PCB ARTICLES IN STORAGE FOR DISPOSAL								
A. TRANSFORMERS	0	0	0	0	0	0	0	0
B. CAPACITORS	0	0	0	0	0	0	0	0
C. ELECTRIC MOTORS	0	0	0	0	0	0	0	0
D. PUMPS	0	0	0	0	0	0	0	0
E. PIPES	0	0	0	0	0	0	0	0
F. CONTAINERS	0	0	0	0	0	0	0	0
G. ARTICLE CONTAINERS	0	0	0	0	0	0	0	0
H. CLEANUP DEBRIS	0	0	0	0	0	0	0	0
I. OTHERS	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0

NOTES:

1. POLE TRANSFORMER PCB WEIGHT ESTIMATED TO BE 140 KG. EACH
2. CAPACITOR PCB WEIGHT ESTIMATED TO BE 1.36 KG. EACH



**SK HAND TOOL CORPORATION**

135 Hickory Street  
Defiance, OH 43512  
(419) 784-1122  
FAX (419) 782-1236

---

South Richland Fire Department  
1915 East Second Street  
Defiance, Ohio 43512  
Attn: Mr. Bob Lehman

July 15, 1996

Dear Mr. Bob Lehman:

The SK Hand Tool facility recently had an inspection concerning PCB's which was conducted by the Ohio E.P.A.. During the course of the inspection it was determined that we are required to notify you of a PCB containing transformer that is located on our facility. This PCB containing transformer is located as per the attached facility layout.

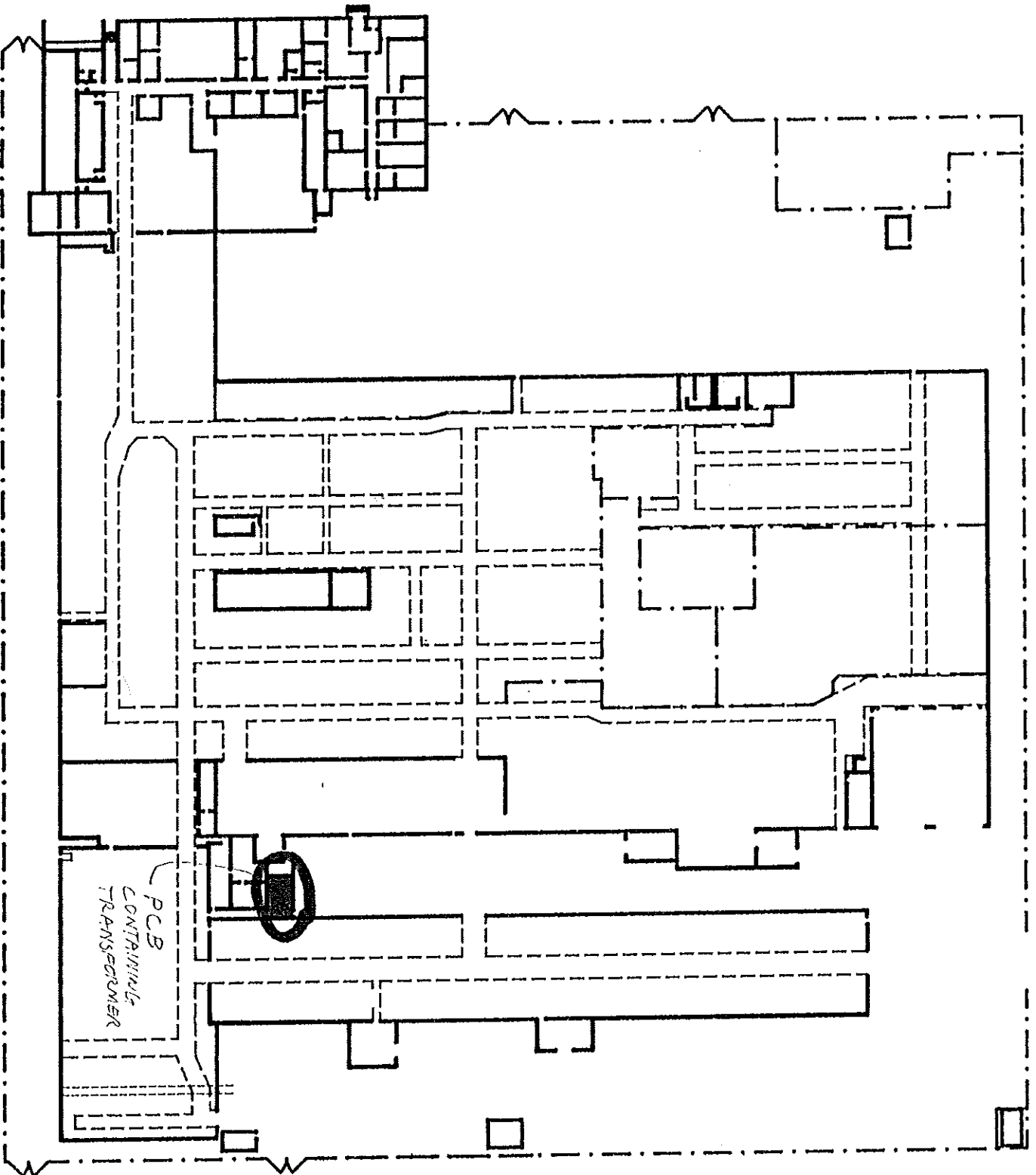
This letter will serve as notice that this facility has in its building a PCB containing transformer.

If you are in need of any further information please do not hesitate to call.

Jeff Baden  
Engineering Supervisor



SK HAND TOOL DEFIANCE, OHIO



SK Pels - 6.4-96

10:30 AM

Roger Bennett - Chief Electrician  
Jeff Bader - Engineering Supervisor

Est. ?

Employees - 150  
Sq. ft. - 260,000

International Dist. Products -

Bring in Raw Steel Bars -

Forge product for Raw Steel Bars -

Heat tools -

Forging, Machining, Grinding, Polishing etc.

Middle-chrome plating -

also Chicago Plant -

Wholly owned by FRCOM - FRCOM Company.  
CEO + Locations -

- Never disposed of PCB original
- No PCB Storage area so PCB in storage
- No annual Documents -
- No annual Records
- PCB Mounted former Ashland is dated -
- No inspectors annual kept
- Haven't notified F.D.

Allis Chalmers - 3/4 28004 341 gals  
 2000 KVA - 12470 Volts.  
 4400 lbs. Ground

Vault is Marked with ML

former is not Marked with ML  
 has Metal plate

Was Metal Caution plate - Re PCBs -  
 what is do it looking like

PCB's

5 pdes with 3 x fans each -

1 pad mount - Askarel - Name plated -

(16)

1 of pde mounted was worked on

Oil filled switch -

Here Cap mounted - 480 Volts -  
low voltage - ~~#~~ Not known.

3 caps outside 12470 Volt -

- 2 compressors with power factor caps -

- Only older Machines in H<sub>2</sub>O Based.

- others - H<sub>2</sub>P - 72 + H<sub>2</sub>P-68 Hydraulic oil -  
all are small - < 20 gals -

- Compressor handles waste oil -

- 1200 gal tank for waste oil - 5% drain  
a year -

- Have 3 heating furnaces -  
use H<sub>2</sub>O coils to cool in the 5th flr  
third.

6 caps 3 each / 150 Lys. notes.

Bank of 8 Caps Low Volt.

~~2~~ bank of 2 each

3 Large high Volt Caps Not Made

6  
8  
4  
—  
+ 18  
3  
—  
21

Violations -

761.30- No Annual Report

761.40 No M<sub>2</sub> - forms - 3 large high Volt caps

761.180 FD Notifications, Annual Reports -

Documentation of 3 forms changed out by  
Toledo Edison -

FACILITY CONTACT FORM FOR PCB INSPECTION

Facility Name: SK Tools

Facility Address: 135 Hickory St

Defiance, OH 43512-2476

Phone Number: (419) 784-1122

Date Contacted: 2-7-96

Environmental Contact & Title: James R. Slaughter Jill Baden

SIC Number: 2-13-95

Date of Inspection: \_\_\_\_\_

Time: 10:30 ±

Postpone until after 1996

June 4th

Checklist:

-Ohio TSCA PCB Program explained: \_\_\_\_\_

-Selection process - Neutral inspection scheme: \_\_\_\_\_

- Pollution incident report: \_\_\_\_\_

-Inspection procedure -Opening conference:

(records required)

-Facility Walk Through:

-Closing Conference:

(discuss violations)

Directions to facility Hopkins St East on Hopkins

3rd & 4th blocks - Rt. 100 + Hopkins

Inspectors Signature \_\_\_\_\_ Date \_\_\_\_\_

CHS 2-4- 4933 12.2 16.00

Joe Henner  
513-651-3440

# OHIOEPA

State of Ohio Environmental Protection Agency

P.O. 1049, WaterMark Drive  
Columbus, Ohio 43216-1099  
(614) 644-3020  
Fax (614) 644-3250

George V. Voinovich  
Governor

## FACSIMILE INFORMATION

ROUTE TO: Kendall Moore PHONE # \_\_\_\_\_  
COMPANY NAME: U.S. EPA  
COMPANY FAX NUMBER: \_\_\_\_\_  
FROM: Mike Wheeler  
NUMBER OF PAGES: 5 (INCLUDING THIS PAGE)

OHIO EPA FACSIMILE NUMBER 614-644-3250

## OFFICE NUMBERS

( ) 614-644-3196 (ER)  
( ) 614-644-3042 (SIU)  
( ) 614-644-3063 (PCB)  
( ) 614-644-2924 (DERR)  
( ) 614-644-2260 (SERC/RTK)

SPECIAL INSTRUCTIONS: \_\_\_\_\_

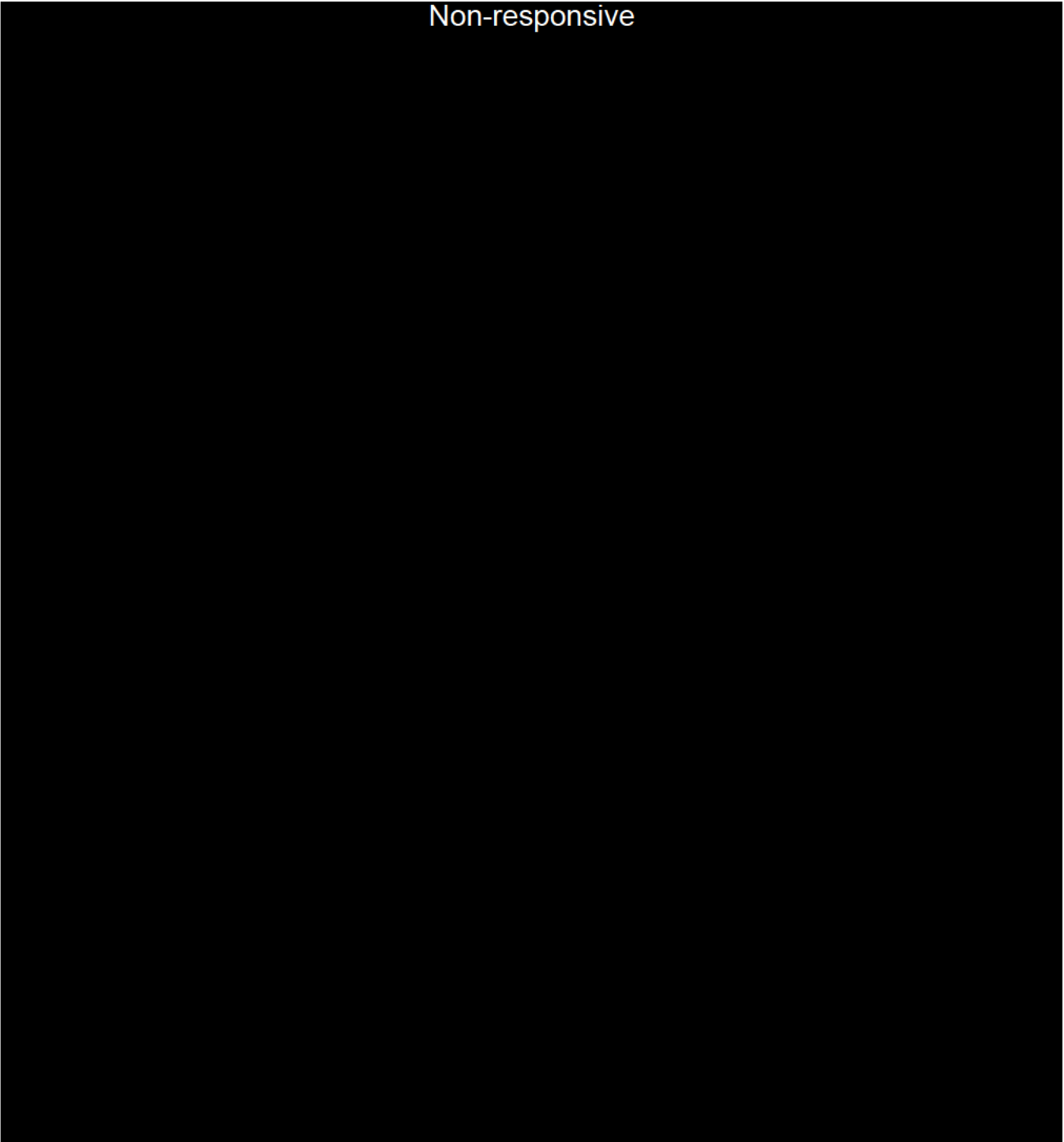
SENDERS INFORMATION: (AFTER TRANSMISSION) ORIGINAL SHOULD BE:

( ) DISCARDED OR ( ) PICKED-UP:

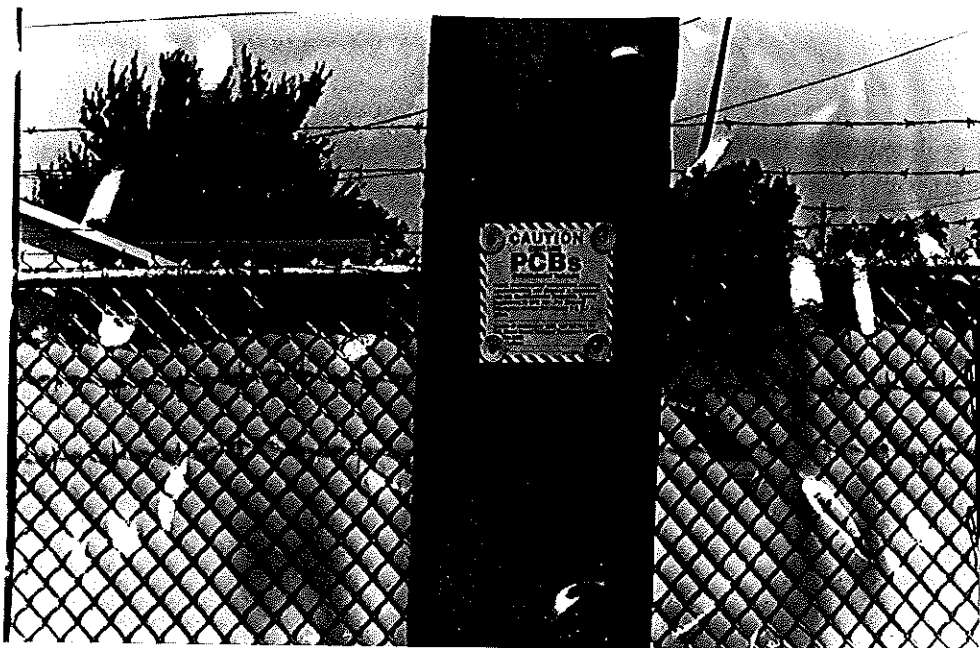
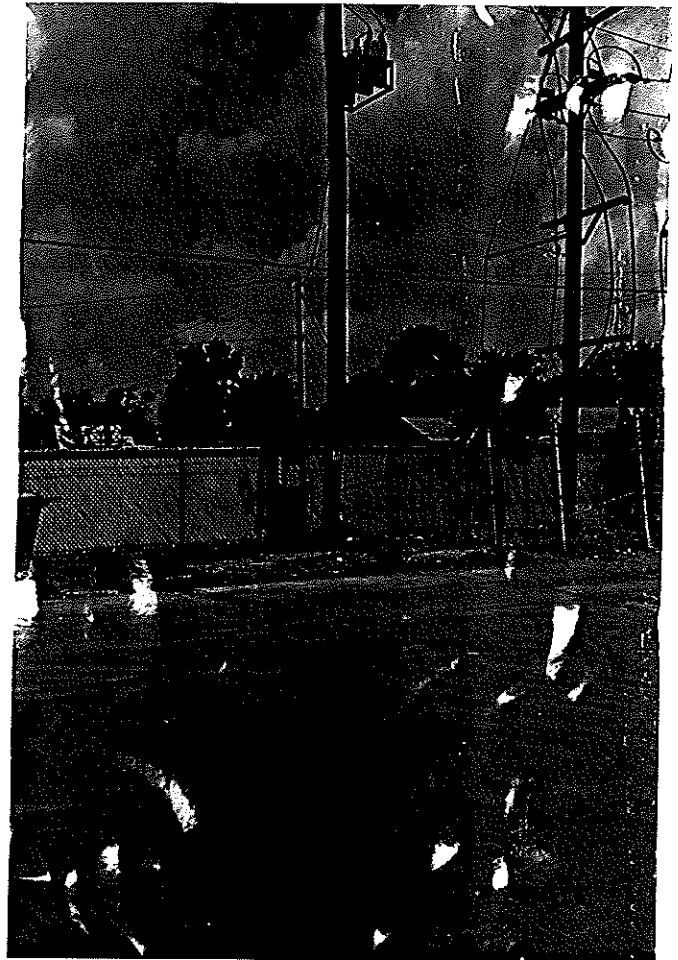
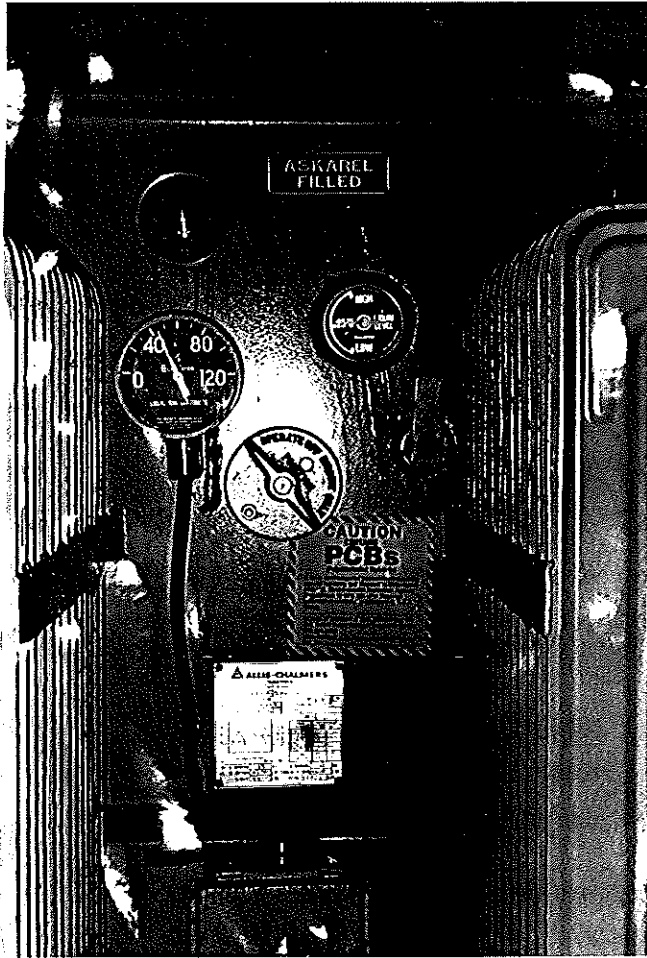
RECEIVER: IF YOU DO NOT RECEIVE THE NUMBER OF PAGES SPECIFIED ABOVE OR RECEIVE POOR COPY, PLEASE NOTIFY US.

NOTE TO RECEIVER:

Non-responsive









UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

DEPP  
FYI

JUN 20 1997

REPLY TO THE ATTENTION OF:  
DRT-14J

*Ralk/Ken - fgi.  
jc 6/30/97*

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

C.T. Corporation System  
815 Superior Avenue, N.E.  
Cleveland, OH 44114

**Re: Complaint and Notice of Opportunity for Hearing**  
**SK Hand Tool Corporation 5-TSCA- '97-011**

Dear Sir:

A Complaint and Notice of Opportunity for Hearing is enclosed. In the complaint, the United States Environmental Protection Agency alleges violations of the Toxic Substances Control Act, 15 U.S.C. § 2601 et seq., discovered by a United States Environmental Protection Agency representative at SK Hand Tool Corporation, 135 Hickory Street, Defiance, OH 43512.

I recommend that you carefully read and analyze the Complaint and the enclosed Rules of Practice, 40 C.F.R. Part 22, to determine the alternatives available in responding to the alleged violations, proposed penalties and opportunity for a hearing. Please note that each day that the violations continue constitutes a new violation for which additional penalties may be imposed.

If SK Hand Tool Corporation chooses to request a hearing to contest the facts alleged in the Complaint, SK Hand Tool Corporation is required to request the hearing in its Answer, which it must file with the Regional Hearing Clerk within the prescribed time limit of twenty (20) days following service of this Complaint. A copy of the Answer and Request for Hearing should be sent to Christine Liszewski, Assistant Regional Counsel, Office of Regional Counsel (C-29A), U.S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604-3590. Her telephone number is (312) 886-4670.

Failure to respond to this Complaint and Notice of Opportunity for Hearing by specific answer within twenty (20) days of your

receipt of this Complaint constitutes an admission of the allegations made in the Complaint. Failure to respond to this Complaint may result in the issuance of a Default Order imposing the proposed penalties.

Whether or not SK Hand Tool Corporation requests a hearing, you may request an informal conference to discuss the facts of this case and to arrive at a settlement. If you have any questions about this matter or desire to request an informal conference for the purpose of settlement, please write to Kendall Moore, Pesticides and Toxics Enforcement Section (DRT-14J), U.S. Environmental Protection Agency, 77 West Jackson Boulevard, Chicago, Illinois 60604-3590, or you may telephone him at (312) 353-1147.

Sincerely yours,

*Anthony L. Restaino*

for Phyllis A. Reed, Chief  
Pesticides and Toxics Branch

Enclosures

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

IN RE: )  
 )  
SK Hand Tool Corporation )  
135 Hickory Street )  
Defiance, Ohio 43512 )  
 )  
Respondent. )  
\_\_\_\_\_ )

Docket No. TSCA-V-C- 5-TSCA. '97-011

RECEIVED

JUN 20 1997

REGIONAL HEARING  
CLERK

COMPLAINT  
and  
NOTICE OF OPPORTUNITY FOR HEARING

I

COMPLAINT

GENERAL ALLEGATIONS

1. This is a civil administrative action instituted pursuant to Section 16(a) of the Toxic Substances Control Act ("TSCA"), 15 U.S.C. § 2615(a), and Sections 22.01(a)(5) and 22.13 of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 C.F.R. §§ 22.01(a)(5), 22.13.

2. The Complainant is, by lawful delegation, the Chief of the Pesticides and Toxics Branch, Waste, Pesticides and Toxics Division, Region 5, United States Environmental Protection Agency (U.S. EPA).

3. The Respondent is SK Hand Tool Corporation, a corporation organized under the laws of the State of

Illinois, with a place of business at 135 Hickory Street, Defiance, Ohio 43512.

4. The Polychlorinated Biphenyls ("PCBs") Disposal and Marking regulations were lawfully promulgated pursuant to Section 6 of TSCA, 15 U.S.C. § 2605, on February 17, 1978 (43 Fed. Reg. 7150). The PCBs Manufacturing, Processing, Distribution in Commerce and Use regulations ("PCB rule") were lawfully promulgated on May 31, 1979 (44 Fed. Reg. 31514) and incorporated the disposal and marking regulations. The PCB rule was subsequently amended and partially recodified at 40 C.F.R. Part 761.

5. Respondent is a "person" as defined at 40 C.F.R. § 761.3 and is subject to the prohibitions set forth at 40 C.F.R. Part 761.

6. Respondent is the owner of the facility at 135 Hickory Street, Defiance, Ohio 43512.

7. Respondent is the operator of the facility at 135 Hickory Street, Defiance, Ohio 43512.

8. On June 4, 1996, a representative of the U.S. EPA inspected Respondent's facility located at 135 Hickory Street, Defiance, Ohio 43512, to determine compliance with the PCB rule.

9. At the time of the inspection, Respondent had one transformer in an indoor substation of the facility with containment diking.

10. Respondent's transformer is nameplated as Allis Chalmers, Serial No. 78004, Askarel and contains 344 gallons/4400 pounds of PCBs in concentrations of 500 ppm or greater.

11. At the time of the inspection, the transformer described in paragraph 10 was in use.

12. Respondent's transformer is a PCB transformer as defined at 40 C.F.R. § 761.3.

13. Respondent's PCB transformer is a PCB article as defined at 40 C.F.R. § 761.3.

14. Respondent's PCB transformer is a PCB item as defined at 40 C.F.R. § 761.3.

15. At the time of the inspection, Respondent had three (3) large high-voltage capacitors on a pole outside the facility.

16. Respondent's three (3) large high-voltage capacitors are PCB-contaminated electrical equipment as defined at 40 C.F.R. § 761.3.

17. Respondent's three (3) large high voltage capacitors are PCB articles as defined at 40 C.F.R. § 761.3.

18. Respondent's three (3) large high voltage capacitors are PCB items as defined at 40 C.F.R. § 761.3.

19. As a result of the June 4, 1996 inspection, the Complainant has determined that Respondent has violated the the use, marking, and recordkeeping requirements of the PCB regulations, 40 C.F.R. Part 761, and thereby violated Section 15 of TSCA, 15 U.S.C. § 2614.

20. On April 23, 1997, Complainant sent a pre-filing notice letter to Respondent extending the Respondent an opportunity to advise U.S. EPA of any factors that Respondent believes U.S. EPA should consider before issuing the complaint.

#### COUNT I

21. The General Allegations of the Complaint are incorporated by reference as though set forth here in full.

22. The PCB rule at 40 C.F.R. § 761.30(a)(1)(ix) requires that a visual inspection of each PCB transformer in use or stored for reuse be performed at least once every three months.

23. The PCB rule at 40 C.F.R. § 761.30(a)(1)(xii) requires that records of transformer inspections and maintenance history be developed and maintained at least three years after disposing of the PCB transformer(s).

24. The PCB rule at 40 C.F.R. § 731.30(a)(1)(xiii) allows a visual inspection of PCB transformers to be performed at a reduced frequency of at least once every 12 months if a PCB transformer has impervious, undrained, secondary containment capacity of at least 100 percent of the total dielectric fluid volume of all transformers so contained.

25. During calendar year 1995, Respondent did not perform a visual inspection of its PCB transformer.

26. At the time of the inspection, Respondent did not have records of transformer inspections or maintenance history for its PCB transformer for calendar year 1995.

27. Respondent's failure to conduct a visual inspection of its PCB transformer and/or maintain records of such inspections constitutes a violation of 40 C.F.R. §§ 761.30(a)(1)(xii) and 761.30(a)(1)(xiii) and Section 15 of TSCA, 15 U.S.C. § 2614.

#### COUNT II

28. The General Allegations of the Complaint are incorporated by reference as though set forth here in full.

29. The PCB rule at 40 C.F.R. § 761.30(a)(1)(ix) requires that a visual inspection of each PCB transformer in use or stored for reuse be performed at least once every three months.



30. The PCB rule at 40 C.F.R. §761.30(a)(1)(xii) requires records of transformer inspections and maintenance history to be maintained at least three years after disposing of the PCB transformer.

31. The PCB rule at 40 C.F.R. § 731.30(a)(1)(xiii) allows a visual inspection of PCB transformers to be performed at a reduced frequency of at least once every 12 months if a PCB transformer has impervious, undrained, secondary containment capacity of at least 100 percent of the total dielectric fluid volume of all transformers so contained.

32. During calendar year 1994, Respondent did not perform a visual inspection of its PCB transformer.

33. At the time of the inspection, Respondent did not have records of transformer inspections or maintenance history for its PCB transformer for calendar year 1994.

34. Respondent's failure to conduct a visual inspection of its PCB transformer and/or maintain records of such inspections constitutes a violation of 40 C.F.R. §§ 761.30(a)(1)(xii) and 761.30(a)(1)(xiii) and Section 15 of TSCA, 15 U.S.C. § 2614.

#### COUNT III

35. The General Allegations of the Complaint are incorporated by reference as though set forth here in full.

36. The PCB rule at 40 C.F.R. § 761.30(a)(1)(ix) requires that a visual inspection of each PCB transformer in use or stored for reuse be performed at least once every three months.

37. The PCB rule at 40 C.F.R. § 761.30(a)(1)(xii) requires records of transformer inspections and maintenance history to be maintained at least three years after disposing of the PCB transformer.

38. The PCB rule at 40 C.F.R. § 731.30(a)(1)(xiii) allows a visual inspection of PCB transformers to be performed at a reduced frequency of at least once every 12 months if a PCB transformer has impervious, undrained, secondary containment capacity of at least 100 percent of the total dielectric fluid volume of all transformers so contained.

39. During calendar year 1993, Respondent did not perform a visual inspection of its PCB transformer.

40. At the time of the inspection, Respondent did not have records of transformer inspections or maintenance history for its PCB transformer for calendar year 1993.

41. Respondent's failure to conduct a visual inspection of its PCB transformer and/or maintain records of such inspections constitutes a violation of 40 C.F.R.

§§ 761.30(a)(1)(xii) and 761.30(a)(1)(xiii) and Section 15 of TSCA, 15 U.S.C. § 2614.

COUNT IV

42. The General Allegations of the Complaint are incorporated by reference as though set forth here in full.

43. The PCB rule at 40 C.F.R. § 761.30(a)(1)(ix) requires that a visual inspection of each PCB transformer in use or stored for reuse be performed at least once every three months.

44. The PCB rule at 40 C.F.R. § 761.30(a)(1)(xii) requires records of transformer inspections and maintenance history to be maintained at least three years after disposing of the PCB transformer.

45. The PCB rule at 40 C.F.R. § 731.30(a)(1)(xiii) allows a visual inspection of PCB transformers to be performed at a reduced frequency of at least once every 12 months if a PCB transformer has impervious, undrained, secondary containment capacity of at least 100 percent of the total dielectric fluid volume of all transformers so contained.

46. During calendar year 1992, Respondent did not perform a visual inspection of its PCB transformer.

47. At the time of the inspection, Respondent did not have records of transformer inspections or maintenance history for its PCB transformer for calendar year 1992.

48. Respondent's failure to conduct a visual inspection of its PCB transformer and/or maintain records of such inspections constitutes a violation of 40 C.F.R. §§ 761.30(a)(1)(xii) and 761.30(a)(1)(xiii) and Section 15 of TSCA, 15 U.S.C. § 2614.

COUNT V

49. The General Allegations of the Complaint are incorporated by reference as though set forth here in full.

50. The PCB rule at 40 C.F.R. § 761.30(a)(1)(vi) requires that as of December 1, 1985, all PCB transformers be registered with fire response personnel with primary jurisdiction.

51. At the time of the inspection, Respondent had not registered its PCB transformer with the appropriate fire response personnel.

52. Respondent's failure to register its PCB transformer with fire response personnel constitutes a violation of 40 C.F.R. § 761.30(a)(1)(vi) and Section 15 of TSCA, 15 U.S.C. § 2614.

COUNT VI

53. The General Allegations of the Complaint are incorporated by reference as though set forth here in full.

54. The PCB rule at 40 C.F.R. § 761.40(c)(1) requires that all PCB transformers not marked with an  $M_L$  mark at the time of manufacture, at the time of distribution in commerce (if not already marked), and at the time of removal from use (if not already marked) be marked with an  $M_L$  mark.

55. At the time of the inspection, Respondent's PCB transformer was not marked with an  $M_L$  mark.

56. Respondent's failure to mark its PCB transformer with the  $M_L$  mark constitutes a violation of 40 C.F.R. § 761.40(c)(1) and Section 15 of TSCA, 15 U.S.C. § 2614.

COUNT VII

57. The General Allegations of the Complaint are incorporated by reference as though set forth here in full.

58. The PCB rule at 40 C.F.R. § 761.40(c)(2) requires that all PCB large high voltage capacitors not marked with an  $M_L$  mark at the time of manufacture, at the time of distribution in commerce (if not already marked), and at the time of removal from use (if not already marked) be marked individually with the  $M_L$  mark or that the pole, structure, or fence on which one or more PCB large high voltage capacitors are installed be marked with an  $M_L$  mark.

59. At the time of the inspection, none of the three (3) PCB large high voltage capacitors that were installed on a pole outside the Respondent's facility were marked with an  $M_L$  mark.

60. At the time of the inspection, the pole on which three (3) PCB large high voltage capacitors were installed at the Respondent's facility was not marked with an  $M_L$  mark.

61. Respondent's failure to mark all PCB large high voltage capacitors individually with the  $M_L$  mark or the pole on which the three (3) PCB large high voltage capacitors were installed with the  $M_L$  mark constitutes a violation of 40 C.F.R. § 761.40(c)(2) and Section 15 of TSCA, 15 U.S.C. § 2614.

#### COUNT VIII

62. The General Allegations of the Complaint are incorporated by reference as though set forth here in full.

63. The PCB rule at 40 C.F.R. § 761.180(a) requires that beginning February 5, 1990, each owner or operator of a facility using or storing at least 45 kilograms of PCBs contained in PCB containers, or one or more PCB transformers, or 50 or more PCB large high or low voltage capacitors develop and maintain annual records and a written annual document log of the disposition of PCBs and PCB items. The written annual document log must be prepared for

each facility by July 1 covering the previous calendar year.

64. At the time of the inspection, Respondent had not developed and maintained a written annual document log of the disposition of PCBs and PCB items for calendar year 1994.

65. Respondent's failure to develop and maintain a written annual document log constitutes a violation of 40 C.F.R. § 761.180(a) and Section 15 of TSCA, 15 U.S.C. § 2614.

COUNT IX

66. The General Allegations of the Complaint are incorporated by reference as though set forth here in full.

67. The PCB rule at 40 C.F.R. § 761.180(a) requires that beginning February 5, 1990, each owner or operator of a facility using or storing at least 45 kilograms of PCBs contained in PCB containers, or one or more PCB transformers, or 50 or more PCB large high or low voltage capacitors develop and maintain annual records and a written annual document log of the disposition of PCBs and PCB items. The written annual document log must be prepared for each facility by July 1 covering the previous calendar year.

68. At the time of the inspection, Respondent had not developed and maintained a written annual document log of

the disposition of PCBs and PCB items for calendar year 1993.

69. Respondent's failure to develop and maintain a written annual document log constitutes a violation of 40 C.F.R. § 761.180(a) and Section 15 of TSCA, 15 U.S.C. § 2614.

COUNT X

70. The General Allegations of the Complaint are incorporated by reference as though set forth here in full.

71. The PCB rule at 40 C.F.R. § 761.180(a) requires that beginning February 5, 1990, each owner or operator of a facility using or storing at least 45 kilograms of PCBs contained in PCB containers, or one or more PCB transformers, or 50 or more PCB large high or low voltage capacitors develop and maintain annual records and a written annual document log of the disposition of PCBs and PCB items. The written annual document log must be prepared for each facility by July 1 covering the previous calendar year.

72. At the time of the inspection, Respondent had not developed and maintained a written annual document log of the disposition of PCBs and PCB items for calendar year 1992.

73. Respondent's failure to develop and maintain a written annual document log constitutes a violation of



40 C.F.R. § 761.180(a) and Section 15 of TSCA, 15 U.S.C. § 2614.

COUNT XI

74. The General Allegations of the Complaint are incorporated by reference as though set forth here in full.

75. The PCB rule at 40 C.F.R. § 761.180(a) requires that beginning February 5, 1990, each owner or operator of a facility using or storing at least 45 kilograms of PCBs contained in PCB containers, or one or more PCB transformers, or 50 or more PCB large high or low voltage capacitors develop and maintain annual records and a written annual document log of the disposition of PCBs and PCB items. The written annual document log must be prepared for each facility by July 1 covering the previous calendar year.

76. At the time of the inspection, Respondent had not developed and maintained a written annual document log of the disposition of PCBs and PCB items for calendar year 1991.

77. Respondent's failure to develop and maintain a written annual document log constitutes a violation of 40 C.F.R. § 761.180(a) and Section 15 of TSCA, 15 U.S.C. § 2614.

## II

PROPOSED CIVIL PENALTY

Section 16 of TSCA, 15 U.S.C. § 2615, authorizes the assessment of a civil penalty of up to \$25,000 per day for each violation of TSCA. The civil penalty proposed in this Complaint has been determined in accordance with the statutory penalty criteria of TSCA, set forth at Section 16(a)(2)(B) of TSCA, 15 U.S.C. § 2615(a)(2)(B), which states that the Administrator, in determining the amount of a civil penalty, shall take into account the nature, circumstances, extent and gravity of the violations and, with respect to the violator, ability to pay, effect on ability to continue in business, any history of prior such violations, the degree of culpability, and such other matters as justice may require. In analyzing the facts and circumstances of this case in consideration of those statutory criteria, Complainant has utilized the "Polychlorinated Biphenyls (PCB) Penalty Policy," dated April 9, 1990, Notice of Availability of Polychlorinated Biphenyls Penalty Policy, 55 Fed. Reg. 13955 (April 13, 1990), a copy of which is enclosed with this Complaint.

The proposed civil penalty has been determined based on the best information available to the Agency at this time. The proposed penalty may be adjusted if the Respondent

establishes a bona fide issue of ability to pay or other affirmative defenses relevant to the determination of the penalty.

Complainant proposes that Respondent be assessed the following civil penalty (with "level" and "extent" references to those identified in the policy) for the violations alleged in the Complaint:

COUNT I

Failure to inspect a PCB transformer during calendar year 1995 and/or maintain records of transformer inspections.....\$13,000

COUNT II

Failure to inspect a PCB transformer during calendar year 1994 and/or maintain records of transformer inspections.....\$13,000

COUNT III

Failure to inspect a PCB transformer during calendar year 1993 and/or maintain records of transformer inspections.....\$13,000

COUNT IV

Failure to inspect a PCB transformer during calendar year 1992 and/or maintain records of transformer inspections.....\$13,000

COUNT V

Failure to register a PCB transformer with fire response  
personnel.....\$13,000

COUNT VI

Failure to mark a PCB transformer with M<sub>L</sub> mark.....\$3,000

COUNT VII

Failure to mark PCB large high voltage capacitors or the  
pole on which they are installed with an M<sub>L</sub> mark.....\$3,000

COUNT VIII

Failure to develop and maintain annual document logs for  
1994.....\$6,000

COUNT IX

Failure to develop and maintain annual document logs for  
1993.....\$6,000

COUNT X

Failure to develop and maintain annual document logs for  
1992.....\$6,000

COUNT XI

Failure to develop and maintain annual document logs for  
1991.....\$6,000

**Total Proposed Penalty.....\$95,000**

Respondent may pay this penalty by certified or  
cashier's check, payable to "Treasurer, the United States of  
America," and remit to:

U.S. Environmental Protection Agency  
Region 5  
P.O. Box 70753  
Chicago, Illinois 60673

A copy of the check shall be sent to:

Branch Secretary  
Pesticides and Toxics Branch (DRT-14J)  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

A transmittal letter identifying this Complaint shall accompany the remittance and the copy of the check.

### III

#### OPPORTUNITY TO REQUEST A HEARING

As provided in Section 16(a) of TSCA, 15 U.S.C. § 2615(a), and in accordance with the Administrative Procedure Act, 5 U.S.C. § 551 et seq., you have the right to request a hearing regarding the proposed Complaint, to contest any material fact contained in this Complaint, and/or to contest the appropriateness of the amount of the proposed penalty. Any hearing that you request will be held and conducted in accordance with the provisions of the Administrative Procedure Act, 5 U.S.C. § 551 et seq., and the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits," 40 C.F.R. Part 22. A copy of these rules accompanies this Complaint.

If you wish to avoid being found in default, you must file a written Answer to this Complaint and Notice of Opportunity for Hearing with the Regional Hearing Clerk, (Mail code: R-19J), U.S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604-3590, within twenty (20) days of service of this Complaint. The Answer must clearly and directly admit, deny or explain each of the factual allegations contained in the Complaint with respect to which Respondent has any knowledge, or clearly state that Respondent has no knowledge as to particular factual allegations in the Complaint. The Answer should also state:

1. The circumstances or arguments that you allege constitute the grounds of defense; and
2. The facts that you intend to place at issue; and
3. Whether you request a hearing.

Failure to deny any of the factual allegations in this Complaint constitutes admission of the undenied allegations.

A copy of this Answer and any subsequent documents filed in this action should be sent to Christine Liszewski, Assistant Regional Counsel, Office of Regional Counsel (Mail code: C-29A), U.S. Environmental Protection Agency, 77 West Jackson Boulevard, Chicago, Illinois 60604-3590.

Ms. Liszewski may be telephoned at (312) 886-4670.

If you fail to file a written Answer, with or without a Request for Hearing, within twenty (20) days of your receipt of this Complaint, the Regional Administrator or Presiding Officer may issue a Default Order. Issuance of this Default Order will constitute a binding admission of all facts alleged in the Complaint and a waiver of your right to a hearing under TSCA. The civil penalty proposed in this Complaint shall then become due and payable without further proceedings sixty (60) days after a Final Order of Default is issued pursuant to 40 C.F.R. § 22.17(a). In addition, the default penalty is subject to the provisions relating to imposition of interest, penalty and handling charges set forth in TSCA, 15 U.S.C. § 2615(a)(4), and the Federal Claims Collection Act of 1966, 31 U.S.C. § 3717. Interest will accrue on the default penalty at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. § 3717. U.S. EPA will impose a late payment handling charge of \$15.00 after thirty (30) days, with an additional charge of \$15.00 for each subsequent 30-day period over which an unpaid balance remains. In addition, U.S. EPA will apply a six (6) percent per annum penalty on any principal amount not paid within ninety (90) days of the date that the Default Order is signed by the Regional Administrator or Presiding Officer.

## IV

SETTLEMENT CONFERENCE

Whether or not you request a hearing, you may request an informal conference in order to discuss the facts of this case and to arrive at a settlement. To request a settlement conference, write to Kendall Moore, Pesticides and Toxics Enforcement Section (Mail code: DRT-14J), United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604-3590, or telephone him at (312) 353-1147.

Your request for an informal settlement conference does not extend the twenty (20) day period during which you must submit a written Answer and Request for Hearing. You may pursue the informal conference procedure simultaneously with the adjudicatory hearing procedure.

U.S. EPA encourages all parties against whom a civil penalty is proposed to pursue the possibilities of settlement through an informal conference. However, U.S. EPA will not reduce the penalty simply because such a conference is held. Any settlement that may be reached as a result of such conference shall be embodied in a written Consent Agreement and Consent Order issued by the Regional Administrator, U.S. EPA, Region 5. The issuance of such a



Consent Agreement shall constitute a waiver of your right to request a hearing on any stipulated matter in the Agreement.


for Anthony L. Restaino  
Phyllis A. Reed, Chief  
Pesticides and Toxics Branch  
Waste, Pesticides and Toxics Division  
U.S. Environmental Protection Agency  
Region 5  
Chicago, Illinois 60604-3590

Dated: 6/13/97

**CERTIFICATE OF SERVICE**

*This is to certify that the ORIGINAL and ONE COPY of this Complaint and Notice of Opportunity for Hearing was filed with the Regional Hearing Clerk (R-19J), U.S. EPA - Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604-3590 on June 20, 1997, and that a true and correct copy was mailed along with the Consolidated Rules of Practice, 40 C.F.R. Part 22, and the Polychlorinated Biphenyls (PCB) Penalty Policy to Respondent:*

*CT Corporation System  
Registered Agent for:  
SK Hand Tool Corporation  
815 Superior Avenue, N.E.  
Cleveland, Ohio 44114*

  
*Marlene Bronson (DRT-14J)  
Pesticides and Toxics Branch  
U.S. EPA - Region 5  
Chicago, Illinois 60604-3590*

SK HAND TOOLS CORP.

SPCC/DERR

DEFIANCE CO.



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
Bowling Green, Ohio 43402  
(419) 352-8461 FAX (419) 352-8468

Bob Taft  
Governor

August 28, 2001

Mr. William Zirkle, Environmental Coordinator  
SK Hand Tool Corporation  
133 Hickory Street  
Defiance, Ohio 43512

Re: SPCC Plan Review

Dear Mr. Zirkle:

Thank you for allowing me to visit your facility and for submitting your Spill Prevention Control and Countermeasure (SPCC) Plan to me on August 8, 2001. The visit was conducted as a routine inspection to verify your facility's compliance with the SPCC regulations included in 40 CFR 112. Based on the notes gathered during the inspection and after reviewing the SPCC plan, I offer the following comments and suggestions to assist your company in meeting the requirements and intent of the SPCC regulations.

**Comments/Suggestions**

**Compliance Review** Page: SPCC Regulations have been in place since 1974. Therefore, a complete review page should be included that shows review dates consistent with the three-year review schedule required by 40CFR112.5(b) beginning 1977 or three years after the first anniversary date of the facility's meeting the threshold for preparing an SPCC Plan. Please add a page to the plan that will show the dates the plan has been reviewed since its issuance.

**Prevention Measures:**

Over 12 items are listed under Section 112.7 of the SPCC Regulations. Comments relating to several of these items are commented on below. These items are normally described within the SPCC plan, and are implemented physically at the facility, or through management practices that are documented throughout the Plan.

**A. Drainage of Containment:** Section 112.7(e) (i-v) requires that a description of how accumulated rain water or snow melt is drained from secondary containment or the diversion, be provided. Most plans also reference an appendix that is an example of the checklist that employees use when draining accumulated water. Please include this in your plan.

**B. Visual Inspections:** Section 112.7(e)(2) asks for a description of the process as described in item C, as to how employees will look for drips, seeps, or spills of oil from equipment when the sites are visited. Also a description of sorbents or other clean up supplies that would be used if a release was discovered must be included in the Plan. Include the above-mentioned issues in the Plan.



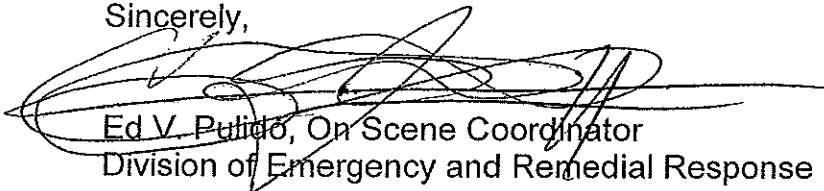
Mr. William Zirkle, Environmental Coordinator  
August 28, 2001  
Page 2

**C. Record Keeping:** At least three types of records need to be maintained for a facility subject to SPCC. An example of each form used should be placed in the Plan, along with how an inspector could find these records, since they are in some situations not a part of the Plan. These records must be kept for three years. The three types of records are: 1) Visual Inspections, 2) Training, and 3) Integrity testing. These are not referenced, nor do examples appear in your Plan as required by Section 112.7(e)(8) of the regulations.

**D. Training:** Section 112.7(e)(10). While your Plan does describe a general training program, the attachment of a sample course outline is recommended. Also, as noted in C, the location of training records should be incorporated. Additionally, a copy of the "Spill Response and Cleanup Field Guide" referenced here should be annexed to the Plan. Further description of the training provided to persons designated as accountable for spill prevention and spill response is also recommended.

The issues raised by our review of your Generic SPCC Plan should be addressed as quickly as possible to ensure that any potential releases of oil are prevented or minimized. Please incorporate the changes within sixty days of receipt of this letter. If you have any questions regarding this review or my comments, please contact me by phone at (419) 373-3041 or by e-mail at [ed.pulido@epa.state.oh.us](mailto:ed.pulido@epa.state.oh.us).

Sincerely,



Ed V. Pulido, On Scene Coordinator  
Division of Emergency and Remedial Response

/llr

pc: Mike Czeczele, Supervisor, ER, NWDO  
SPCC Files

**SPILL PREVENTION CONTROL AND  
COUNTERMEASURE PLAN**


**FOR**

**SK HAND TOOL CORPORATION  
DEFIANCE MANUFACTURING FACILITY  
135 HICKORY STREET  
DEFIANCE, OHIO 43512**

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

SK HAND TOOL CORPORATION  
133 HICKORY STREET  
DEFIANCE, OHIO 43512  
(419)784-1122

COMPANY CONTACT: David Bidlack  
135 HICKORY STREET  
24 HOUR TELEPHONE NUMBERS:  
(419)784-1122 (419)782-9287

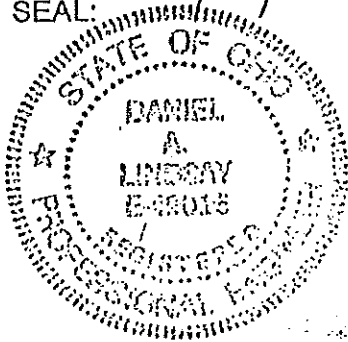
P. E. CERTIFICATION INFORMATION  
ENGINEER ( PRINT NAME): Daniel A. Lindsay, P.E.  
SIGNATURE: 

REGISTRATION NUMBER: E49016

STATE: Ohio

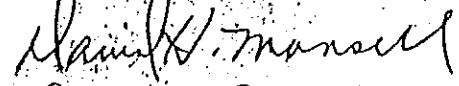
DATE: 6/16/96

SEAL:



MANAGEMENT STATEMENT OF APPROVAL

I hereby certify that this plan will be implemented as necessary in the event of a spill from this facility. This certification commits any and all resources necessary to prevent a release from this facility from impacting waters of the state of Ohio.

Signature: 

Title: 

Date: 

June 18, 1997

Poggmeyer Design Group  
Received


JUN 16 1997

## SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

COMPANY CONTACT: Gene Robbins  
135 HICKORY STREET  
DEFIANCE, OHIO 43512  
(419) 784-1122

### MANAGEMENT STATEMENT OF APPROVAL

I hereby certify that this plan will be implemented as necessary in the event of a spill from this facility. This certification commits any and all resources necessary to prevent a release from this facility from impacting waters of the state of Ohio.

Signature:   
Title: VP, Human Resources  
Date: 2/28/2002



## OWNER/OPERATOR INFORMATION

SK Hand Tool Corporation  
135 Hickory Street  
Defiance, OH 43512

Telephone Number:  
(419) 784-1122

Leonard D. O'Connell  
Vice President, Human Resources  
Acting Plant Manager

Parent Company Name:

SK Hand Tool Corporation

Address:  
3535 W. 47<sup>th</sup> Street  
Chicago, IL 60632

Telephone Number:  
(773) 523-1300

Contact:

Leonard D. O'Connell  
Vice President, Human Resources

## EMERGENCY NOTIFICATION AND RESPONSE LIST

Facility Emergency Coordinator 24-hour telephone number	
Gene Robbins	(419) 784-1122 or (419) 658-2150
Alternate Facility Coordinator 24-hour telephone number	
Jeff Baden	(419) 784-1122 or (419) 758-3502
Fire Department 24-hour telephone number	(419) 395-2211 or (419) 782-3811
Ohio E.P.A.	(800) 282-9378
National Response Center	(800) 424-8802
Local Emergency planning committee 24-hour telephone number	
Mon-Fri 9AM-5PM	(419) 782-1130
All other hours	(419) 784-1155

## Facility Response Personnel Listing

Gene Robbins	Maintenance Supervisor	(419) 658-2150
Paul Klima	Maintenance Employee	(419) 395-1110
Roger Bennett	Maintenance Employee	(419) 636-3325
Vic Vogel	Maintenance Employee	(419) 784-4021
Jason Schooley	Maintenance Employee	(419) 542-8813
Leonard O'Connell	VP Human Resources (Acting Plant Manager)	(773) 523-1300
William Zirkle	Environmental Coordinator	(419) 393-2541

## Cleanup Contractors

Cousins Waste Management	(419) 726-1500
EQ Industrial Services Inc.	1(800) 839-3975

## **Description of Facility**

SK Hand Tool Corporation, Defiance Plant, is located on the East Side of Defiance at longitude 84 degrees, 20 minutes, 21 seconds by latitude 41 degrees, 16 minutes, 48 seconds. The facility sits on approximately seven acres excluding the hourly parking lot.

See the attached site map for the facility layout.

The Defiance facility is a manufacturing plant for the production of hand tools. Tools are manufactured from raw bar stock to finished goods. At this facility there is hot forging, blanking, machining, broaching, polishing, heat treating and plating being performed. The company employs approximately 175 people.

Fencing with minimal access though gates surrounds the facility. Most gates are locked except when access is required by employees. The only gate that remains open during daytime business hours is the one adjacent to the receiving dock. This dock is staffed with our employees.

## **Description of Drainage System**

All roof drains lead to storm sewer lines to the West and South of the facility. These lines drain into a storm drainage ditch, which runs along the rail line to the South of the facility. Ultimately, the drainage ends up in the Preston Run.

Internal drains lead to the city sanitary sewer system. Drains that are located in oil storage or use areas have been permanently sealed. This was done to avoid the potential for an accidental release into the sewer system.

## **Oil Unloading**

Fuel oil is received by bulk shipment. The tanker pumps the fuel directly into bulk storage containers. A SK employee supervises bulk receipt.

All other oil is delivered to the facility in containers through our receiving dock. These are received by a SK employee and are transported to a drum storage facility.

## Oil Storage

During the course of production, the SK Hand Tool Corporation uses various types of oil. The oil storage areas are listed below along with estimated probabilities and potential severity of any spills.

### 1) Diesel Fuel Storage

There are two above ground fuel tanks; one contains Diesel Supreme, the other No 2 Fuel Oil. The tanks have a capacity of 2000 gallons each. However, generally only 500 gallons are kept in each tank.

The probability of a spill from these tanks is low and the potential for pollution severity is very low.

### 2) Used Oil Storage

There is a 1200-gallon above ground used oil tank (plastic) located on the East Side of the plant. This tank is used for the blow down of the compressed air system.

The probability of a spill from this tank is low and the potential for pollution severity is very low.

### 3) Heat Treat Area

In the Heat Treating Area, we have <sup>3</sup>two quench tanks. These above ground tanks hold 480 gallons of standard quench oil.

The probability of a spill from these tanks is low and the potential for pollution severity is very low.

### 4) Drum Storage Area

We store up to ten drums of oil in a storage area. Maximum storage in this above ground area is 550 gallons.

The probability of a spill from these drums is low and the potential for pollution severity is very low.

## Containment Method

The following is an explanation of the containment means employed for each oil storage area listed above.

### 1) Diesel Fuel Storage

The two fuel tanks are steel diked at 110% containment. The rainwater that can collect in our steel containment is visually monitored and pumped into a holding tank for removal by a licensed waste hauler.

2) Used Oil Storage

The used oil tank is a double wall plastic tank. It is located on plastic-lined stone bed. A licensed waste hauler removes the oil/water mixture.

3) Heat Treat Area

In the Heat Treating Area, we have sealed the floor drain to eliminate the possibility of an oil spill reaching the storm sewer. In the event of a spill, oil-absorbing materials would be used to contain and clean up the oil. These materials would be disposed in accordance to all applicable regulations.

4) Drum Storage Area

This area is self-contained with a dike and reservoir system. Should a leak occur, the waste oil would be pumped from the dike into waste oil drums and would be removed by a licensed waste hauler.

5) Drainage of Containment Areas

When the liquid level in the containment area get 12 inches deep the fluid will be pumped into the 1200 gallon waste oil container to be hauled away for disposal.

### **Oil Spill Contingency Plan**

Should an accidental oil spill occur, the following plan will go into effect:

1. Whoever discovers the spill is to alert their supervisor who in turn will notify the Plant Manager, the Maintenance Supervisor, and the Environmental Engineer.
2. The Maintenance Supervisor shall alert appropriate personnel in the area of the spill and proceed to locate the source of the oil and stop the flow by closing valves, making temporary barricades, use of absorbents, etc.
3. The Maintenance Supervisor repairs the source of the spill as soon as possible to prevent additional leakage.
4. If the spill has reached the sanitary sewer, the Maintenance Supervisor or the Environmental Coordinator will report the incident immediately to the local Water Pollution Control Plant at 782-0840.
5. Should the spill reach the waterway bordering the property, the Environmental Coordinator will report the incident to the Ohio EPA and the National Response Center. Their telephone numbers are listed in Section II.
6. Once the oil is contained, the clean up work must proceed as soon as possible. Where applicable, portable pumping into holding drums should be used for future salvage or disposal. However, the use of absorbent material to clean up the spill will also be permitted. Disposal of oil and/or containment materials must follow the appropriate EPA regulations.

## **Personnel and Training**

1. The Maintenance Supervisor will be responsible to ensure that all parties receive annual instruction in regard to prevention, emergency action and regulatory changes concerning oil spills.
2. The Environmental Coordinator will audit the improving spill prevention and containment plan annually and will implement improvement programs to overcome any deficiencies.

## **Equipment Needs**

1. The Maintenance Supervisor and Shift Supervisors have access to additional tools located in the Maintenance storage area.
2. The telephone numbers of the contractors for clean up are listed on page 3 of this document.
3. An inventory of absorbent material, pad & blanket, and drums (to pump oil into) will be maintained and will be available for excess oil spillage.

## **Inspection and Records**

1. Weekly inspections shall be made for drips, seeps or spills of oil in the following areas and maintained on appropriate inspection forms:
  - A. Bulk storage tanks for Fuel Oil.
  - B. Used Oil Tank
  - C. Heat Treat Area
  - D. Drum Storage Area
2. The inspection shall be visual and shall be designed to ensure that any possible leak can be detected.
3. A member of the Maintenance Department shall make inspections. Records shall be kept on file and retained for a period of three years in the Maintenance Department.

## **Review and Amendments**

1. The SPCC Plan will be reviewed annually as part of the internal quality audit.
2. The SPCC Plan shall be amended anytime there is a major change in the facility design, construction, operation, or maintenance in regards to the potential of oil spills in the plant.

## RECORDS OF REVIEWS AND AMENDMENTS

December 2001: Maintenance supervisor and Facility  
Emergency Coordinator changed. Plant manager changed.  
Description of when and where to pump Diesel contaminate areas.  
Added inspection sheet.

Inspection made weekly for drips, seeps or spills of oil in these areas.

Inspection made weekly for drips, seeps or spills of oil in these areas.

[illegible]



## TRAINING

10/10/2000 Hazardous material and spill training by Jane Schmid.

## SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

SK HAND TOOL CORPORATION  
133 HICKORY STREET  
DEFIANCE, OHIO 43512  
(419) 784-1122

P. E. CERTIFICATION INFORMATION  
ENGINEER (PRINT NAME):  
SIGNATURE:

REGISTRATION NUMBER:  
DATE:  
SEAL:

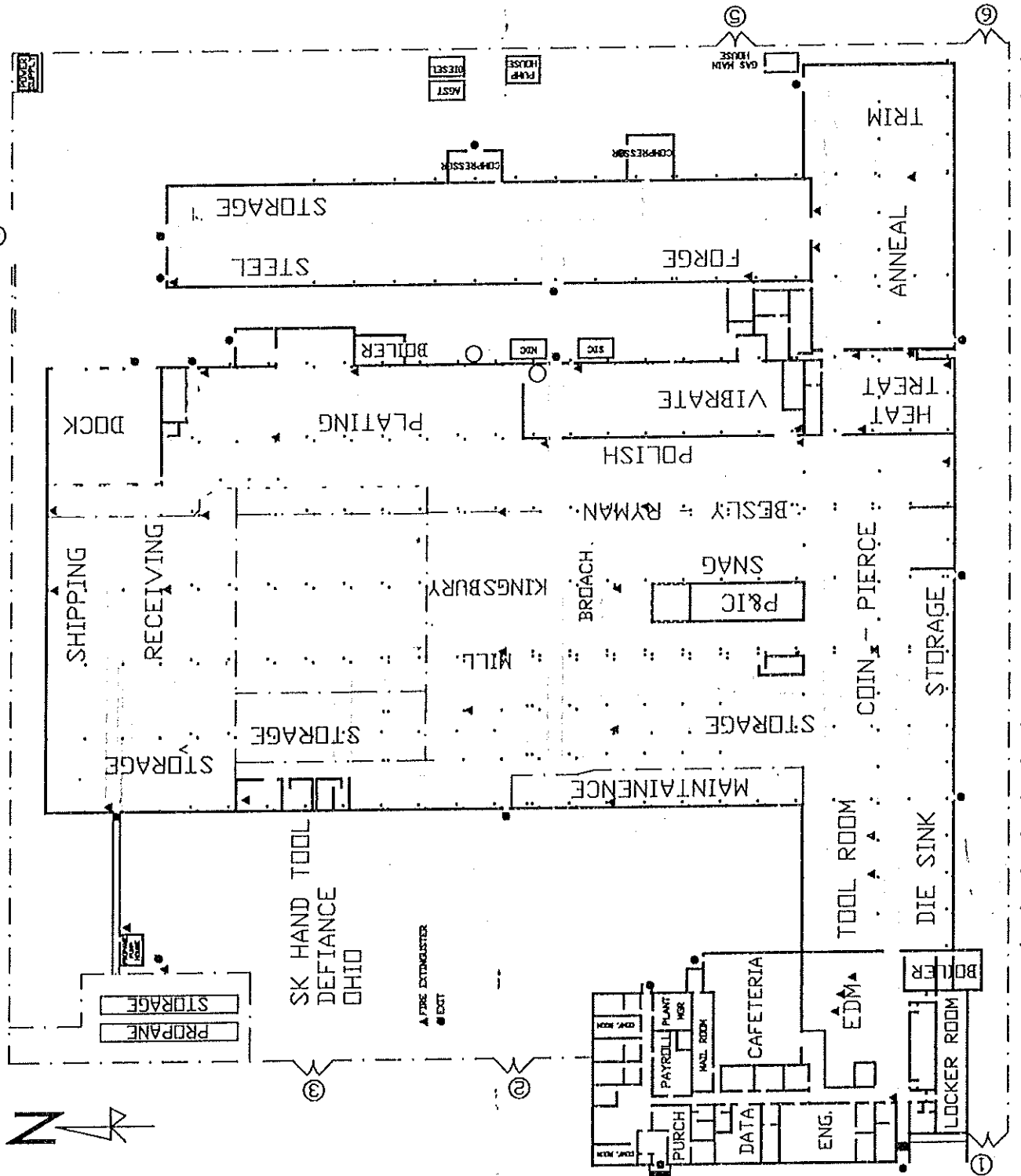
STATE:

HOPKINS STREET

HICKORY STREET

BUCKEYE STREET


SPRUCE ST.



SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

SK HAND TOOL CORPORATION  
133 HICKORY STREET  
DEFIANCE, OHIO 43512  
(419)784-1122

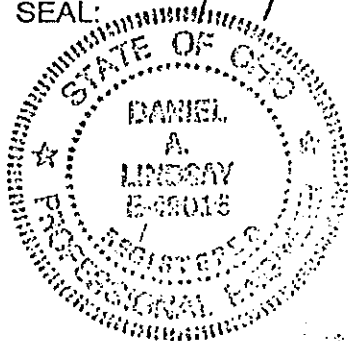
COMPANY CONTACT: David Bidlack  
135 HICKORY STREET  
24 HOUR TELEPHONE NUMBERS:  
(419)784-1122 (419)782-9287

P. E. CERTIFICATION INFORMATION  
ENGINEER ( PRINT NAME): Daniel A. Lindsay, P.E.  
SIGNATURE: 

REGISTRATION NUMBER: E49016

STATE: Ohio

DATE: 6/16/96  
SEAL:



MANAGEMENT STATEMENT OF APPROVAL

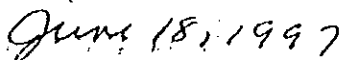
I hereby certify that this plan will be implemented as necessary in the event of a spill from this facility. This certification commits any and all resources necessary to prevent a release from this facility from impacting waters of the state of Ohio.

Signature: 

Title:

  
Defiance Plant Manager

Date:

  
June 18, 1997

Poggmeyer Design Group  
Received

JUN 16 1997

## Emergency Notification and Response List

1/22/2001

### Facility Emergency Coordinator 24 hour telephone number

Gene Robbins (419)784-1122 or (419) 658-2150

### Alternate Facility Emergency Coordinator 24 hour telephone number

Jeff Baden (419)784-1122 or (419) 758-3502

### Fire Department 24 hour telephone number

(419)395-2211 or (419)782-8754

### Defiance water pollution control

(419) 782-0841

Ohio E.P.A 1-800-282-9378

National Response Center 1-800-424-8802

### Local Emergency planning committee 24 hour telephone number

Mark Hopper (419)784-1155

### Facility Response Personnel Listing

Gene Robbins	Supervisor	(419) 658-2150
Paul Klima	Maintenance Employee	(419) 395-1110
Roger Bennett	Maintenance Employee	(419) 636-3325
Vic Vogel	Maintenance Employee	(419) 784-4021
Jason Schooley	Maintenance Employee	(419) 542-8813
Jeff Baden	Engineering Manager	(419) 758-3502
Bill Zirkle	Environmental Coordinator	(419) 393-2541

### Cleanup Contractors

EQ Industrial Services 1-800-839-3975

Cousins Waste Management 1-800-433-6754

OWNER/OPERATOR INFORMATION

SK Hand Tool Corporation  
135 Hickory Street  
Defiance, Ohio 43512

Telephone Number:  
(419)784-1122

David Mansell  
Plant Manager

Parent Company Name:

SK Hand Tool Corporation

Address:  
3535 W. 47th Street  
Chicago, IL 60632

Telephone Number:  
(773)523-1300

Contact:  
Leonard D. O'Connell  
Vice President, Human Resources

## Emergency Notification and Response List

Facility Emergency Coordinator 24-hour telephone number  
David Bidlack (419)784-1122 or (419)782-9287

Alternate Facility Coordinator 24-hour telephone number  
David Mansell (419)784-1122 or (419)782-8754

Fire Department 24-hour telephone number  
(419)395-2211 or (419)782-3811

Defiance Water Pollution Control

419-782-0841

Ohio E. P. A. 1-800-282-9378

National Response Center 1-800-424-8802

Local Emergency planning committee 24-hour telephone number  
Ned Spiser Mon-Fri. 9 am.- 5 pm (419)782-1130 all other hours (419)784-1155

## Facility Response Personnel Listing

David Bidlack	Technical Services Manager	(419)782-9287
Paul Klima	Maintenance Employee	(419)395-1110
Roger Bennett	Maintenance Employee	(419)636-3325
Larry Schlegel	Maintenance Employee	(419)393-2960
Vic Vogel/	Maintenance Employee	(419)784-4021
Jason Schooley	Maintenance Employee	(419)542-8813
David Mansell	Plant Manager	(419)782-8754
William Zirkle	Environmental Coordinator	(419)393-2541

## Cleanup Contractors

Cousins Waste Management (800) 433-6754

Inland Waters (800) 992-9118

## Description of Facility

SK Hand Tool Corporation, Defiance plant, is located on the East side of Defiance at longitude: 84 degrees, 20 minutes, 21 seconds by latitude: 41 degrees, 16 minutes, 48 seconds. The facility sits on approximately seven acres excluding the hourly parking lot.

See the attached site map for the facility layout.

The Defiance facility is a manufacturing plant for the production of hand tools. Tools are manufactured from raw bar stock to finished goods. At this facility there is hot forging, blanking, machining, broaching, polishing, heat treating and plating being performed. The company employs approximately 175 people.

The facility is surrounded by fencing with minimal access through gates. Most gates are locked except when access is required by employees. The only gate that remains open during daytime business hours is the one adjacent to the receiving dock. This dock is staffed with our employees.

## Description of Drainage System

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Internal drains lead to the city sanitary sewer system. Drains which are located in oil storage or use areas have been permanently sealed. This was done to avoid the potential for an accidental release into the sewer system.

## Oil Unloading

Fuel oil is received by bulk shipment. The tanker pumps the fuel directly into bulk storage containers. Bulk receipt is supervised by an SK employee.

All other oil is delivered to the facility in containers through our receiving dock. These are received by an SK employee and are transported to a drum storage facility.



## Oil Storage

During the course of production, the SK Hand Tool Corporation uses various types of oil. The oil storage areas are listed below along with estimated probabilities and potential severity of any spills.

### 1) Diesel Fuel Storage

There are two above ground fuel tanks, one contains Diesel Supreme, the other No 2 Fuel Oil. The tanks have a capacity of 2000 gallons each. However, generally only 1000 to 1500 gallons are kept in each tank.

The probability of a spill from these tanks is low and the potential for pollution severity is very low.

### 2) Used Oil Storage

There is a 1200 gallon above ground used oil tank (plastic) located on the East side of the plant. This tank is used for the blow down of the compressed air system.

The probability of a spill from this tank is low and the potential for pollution severity is very low.

### 3) Heat Treat Facility

In the Heat treating facility, we have 3 quench oil tanks. These above ground tanks hold 480 gallons of standard quench oil.

The probability of a spill from these tanks is low and the potential for pollution severity is very low.

### 4) Drum Storage Area

We store up to 10 drums of oil in a storage area. Maximum storage in this above ground area is 550 gallons.

The probability of a spill from these drums is low and the potential for pollution severity is very low.

## Containment Method

The following is an explanation of the containment means employed for each oil storage area listed above.

### 1) Diesel Fuel Storage

The two fuel tanks are steel diked at 110% containment. The rain water that can collect in our steel containment is visually monitored and pumped into a holding tank for removal by a licensed waste hauler.

### 2) Used Oil Storage

The used oil tank is a double wall plastic tank. It is located on a plastic-lined stone bed. The oil/water mixture is removed by a licensed waste hauler.

### 3) Heat Treat Facility

In the Heat Treating facility, we have sealed the floor drain to eliminate the possibility of an oil spill reaching the storm sewer. In the event of a spill, oil absorbing materials would be used to contain and clean up the oil. These materials would be disposed in accordance to all applicable regulations.

### 4) Drum Storage Area

This area is self contained with a dike and reservoir system. Should a leak occur, the waste oil would be pumped from the dike into waste oil drums and would be removed by a license waste hauler.

## Oil Spill Contingency Plan

Should an accidental oil spill occur, the following plan will go into effect;

1. Whoever discovers the spill is to alert their supervisor who in turn will notify the Plant Manager, the Technical Services Manager and the Environmental Coordinator.
2. The Technical Services Manager shall alert appropriate personnel in the area of the spill and proceed to locate the source of the oil and stop the flow by closing valves, making temporary barricades, use of absorbents, etc.
3. The Technical Services Manager will repair the source of the spill as soon as possible to prevent additional leakage.
4. If the spill has reached the sanitary sewer, the Technical Services Manager or the Environmental Coordinator will report the incident immediately to the local Water Pollution Control Plant at 782-0841.
5. Should the spill reach the waterway bordering the property, the Environmental Coordinator will report the incident to the Ohio EPA and the National Response Center. Their telephone numbers are listed in Section II.
6. Once the oil is contained, the clean up work must proceed as soon as possible. Where applicable, portable pumping into holding drums should be used for future salvage or disposal. However, the use of absorbent material to clean up the spill will also be permitted. Disposal of oil and/or containment materials must follow the appropriate EPA regulations.

## Personnel and Training

1. The Technical Services Manager will be responsible to ensure that all parties receive annual instruction in regard to prevention, emergency action and regulatory changes concerning oil spills.
2. The Environmental Coordinator will audit the improving spill prevention and containment plan annually and will implement improvement programs to overcome any deficiencies.

## Equipment Needs

1. The Technical Services Manager and Shift Supervisors have access to additional tools located in the Maintenance storage area.
2. The telephone numbers of the contractors for clean up are listed on page 4 of this document.
3. An inventory of absorbent material, pad & blanket, and drums (to pump oil into) will be maintained and will be available for excess oil spillage.

## Inspection and Records

1. Weekly inspections shall be made of the following areas and maintained on appropriate inspection forms:
  - A. Bulk storage tanks for Fuel Oil
  - B. Used Oil Tank
  - C. Heat Treat Facility
  - D. Drum Storage Area
2. The inspection shall be visual and shall be designed to ensure that any possible leak can be detected.
3. Inspections shall be made by a member of the Maintenance Department. Records shall be kept on file and retained for a period of three years in the Maintenance Department.

## Review and Amendments

1. The SPCC Plan will be reviewed annually as part of the internal quality audit.
2. The SPCC Plan shall be amended anytime there is a major change in the facility design, construction, operation, or maintenance in regards to the potential oil spills in the plant.

## Historical Incident

Spill ID No. 9505-20-27-21

On Thursday, May 25, 1995, approximately 200 gallons of No. 2 Fuel Oil was found to have leaked from a break in a fuel line feeding the hammershop heaters. The fuel line had been set in a self-contained trough to capture any potential leak. Unfortunately, through an unknown connection, the fuel oil leaked into the plant's storm sewer. The fuel oil entered a drainage ditch which feeds into the Maumee River. SK Hand Tool was notified of the spill by local authorities. SK Hand Tools's spill response team went into action and stopped the oil from reaching the Maumee River.

After the spill was cleaned, the Company reviewed the facility. All the previously unknown connections were severed from the storm sewers and concreted shut. The fuel lines were pressure tested and were found to be solid.

No other incident has occurred at the facility.

## Material Safety Data Sheets

The company maintains Material Safety Data Sheets in binders throughout the facility. These can be found in the Hammershop office, in the Machine Room Desk and in the Receiving QC area.

# STORAGE AREAS

(SEE PAGE 6)

COMMERCIAL

RESIDENTIAL

HOPKINS STREET

BUCKEYE STREET

RESIDENT

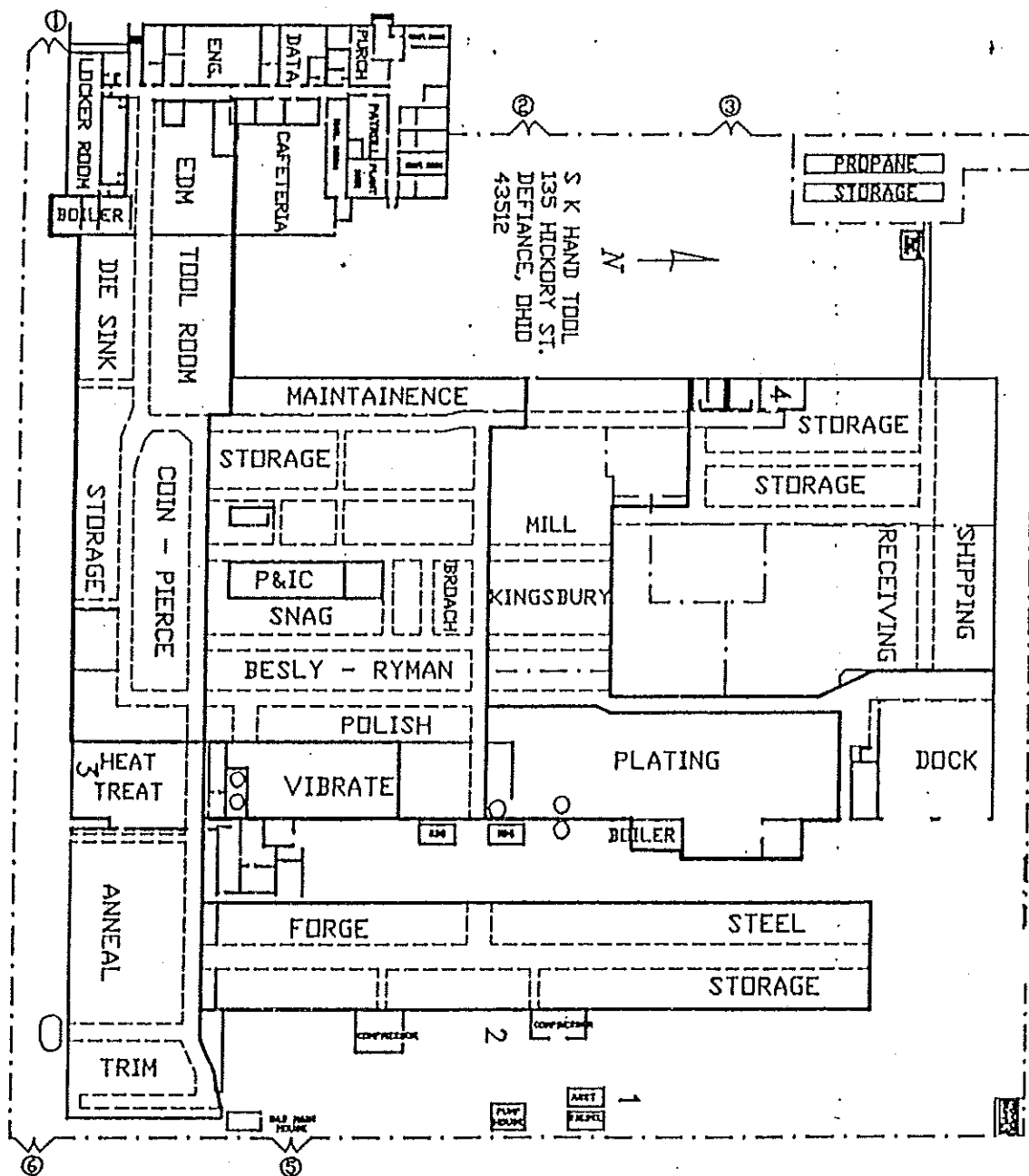
COMMERCIAL

SPRUCE ST.

COMMERCIAL

EMPLOYEE  
PARKING LOT

HICKORY STREET

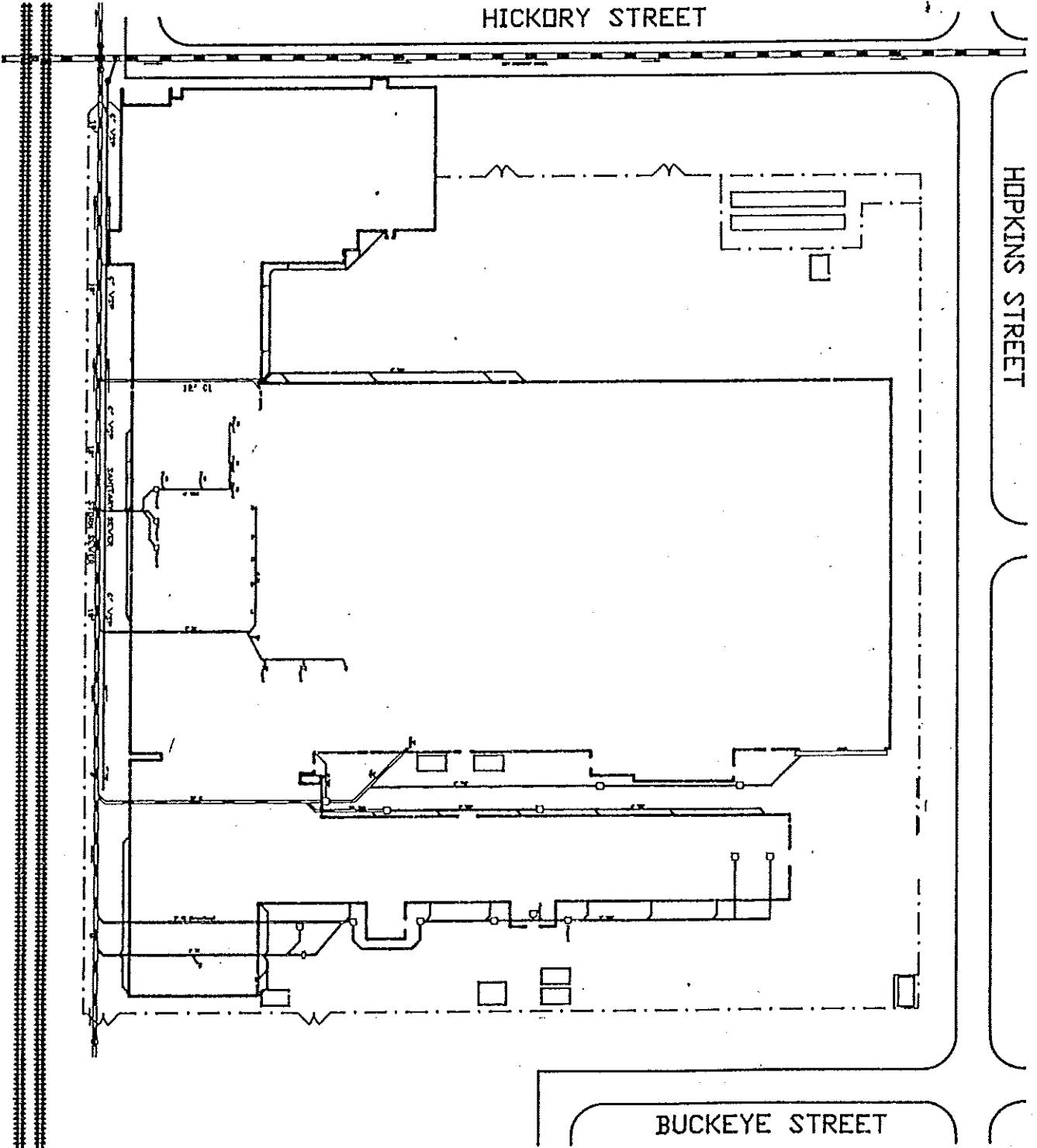
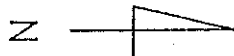


HICKORY STREET

HOPKINS STREET

STORM SEWERS

BUCKEYE STREET





LOCATION OF ABSORBANT MATERIAL

X

COMMERCIAL

RESIDENTIAL

HOPKINS STREET

BUCKEYE STREET

SPRUCE ST.

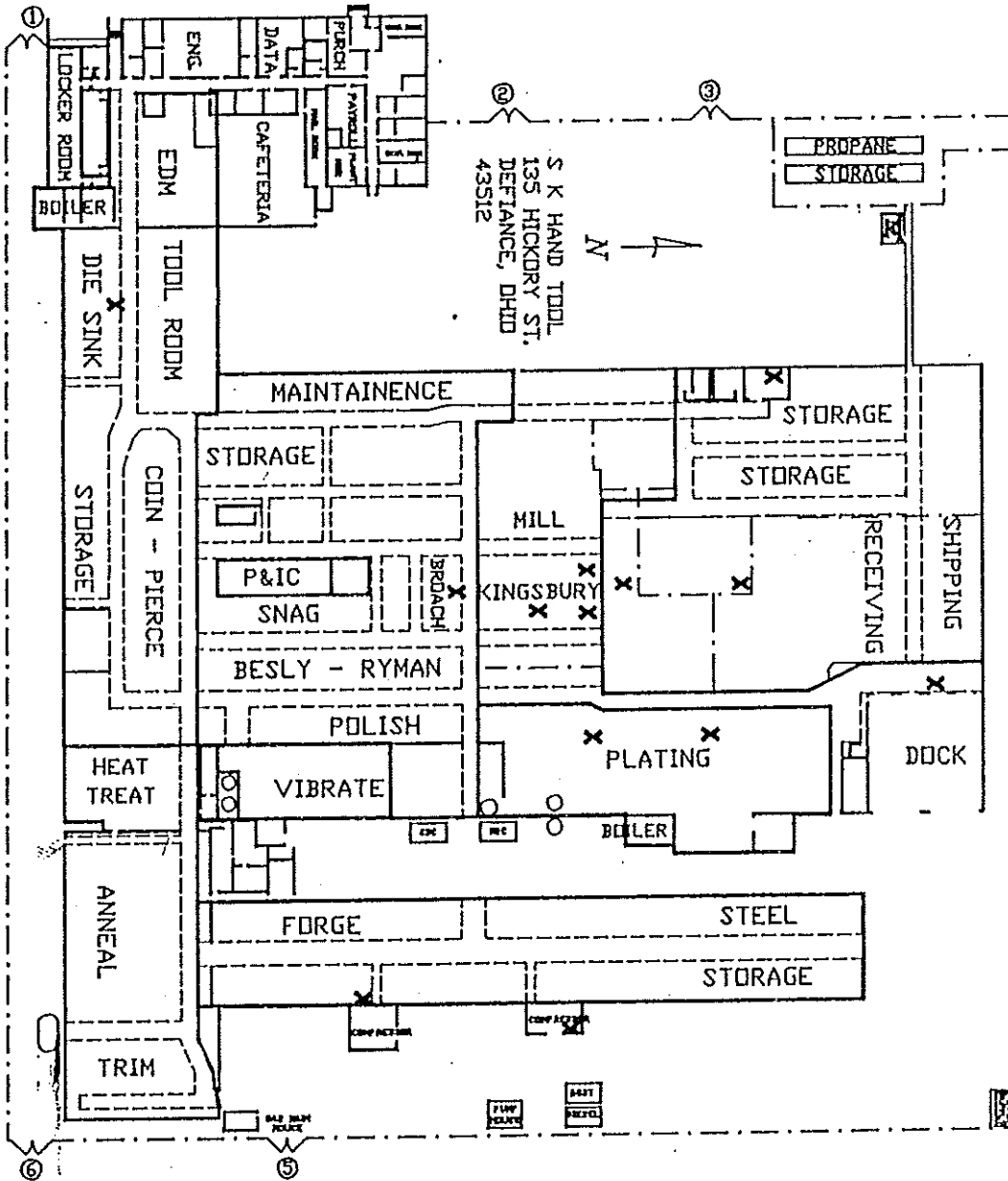
COMMERCIAL

RESIDENT

COMMERCIAL

EMPLOYEE  
PARKING LOT

HICKORY STREET



SK HAND TOOL  
SPILL INCIDENT REPORT FORM

DATE \_\_\_\_\_

TIME \_\_\_\_\_

LOCATION \_\_\_\_\_

MATERIAL(S) INVOLVED \_\_\_\_\_

VOLUME OF MATERIAL(S) SPILLED \_\_\_\_\_

CAUSE OF SPILL \_\_\_\_\_

RESPONSE INITIATED \_\_\_\_\_

PERSONNEL INVOLVED \_\_\_\_\_

CONTRACTORS NOTIFIED (DATE/TIME) \_\_\_\_\_

AGENCY PERSONNEL NOTIFIED (DATE/TIME) \_\_\_\_\_

DISPOSITION OF SPILLED MATERIAL \_\_\_\_\_

WATERWAYS/SEWERS IMPACTED \_\_\_\_\_

COMMENTS \_\_\_\_\_

NAME/TITLE OF PERSON COMPLETING REPORT \_\_\_\_\_

DATE OF REPORT \_\_\_\_\_

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

77 West Jackson Boulevard  
Chicago, Illinois 60604

## Region V SPCC Inspection/Plan Review Checklist

Date of Inspection:

8/8/2001

Inspector's Printed Name/Signature:

Ed V. Pulido

Inspection Team Members:

N/A

Name/Location of Facility:

SK Hand Tool Corporation

Address:

133 Hickory Street

City:

Defiance

County:

Defiance

State:

OH

Zip Code:

43512

Latitude:

41°16'48"

Longitude:

84°20'21"

SIC Code:

Facility Contact/Title:

William Zinkle, Environmental Coordinator

Telephone Number:

(419) 393-2541

Name of Owner/Operator:

(Indicate if owner and/or operator)

Mailing Address:

City:

State:

Zip Code:

Telephone Number:

Synopsis of business operations:

Fabrication of Hand Tools

Route of entry and estimated distance and direction to waterway:

30 yds to

Tributary of the

River

Type of Facility (check all applicable descriptions):

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> onshore    | <input type="checkbox"/> commercial                       |
| <input type="checkbox"/> offshore              | <input type="checkbox"/> agriculture                      |
| <input type="checkbox"/> oil well drilling     | <input type="checkbox"/> public                           |
| <input type="checkbox"/> oil production        | <input type="checkbox"/> waste treatment                  |
| <input type="checkbox"/> oil refining          | <input type="checkbox"/> loading racks                    |
| <input type="checkbox"/> oil storage           | <input type="checkbox"/> vehicles/rail cars (in-facility) |
| <input checked="" type="checkbox"/> industrial | <input type="checkbox"/> pipelines (in-facility)          |
| <input type="checkbox"/> other _____           |   |

Date facility started operations [112.3 (a)]: over 50 years

Date facility first required plan [112.3 (a)]: 6/16/96 first plan

Total number of above ground storage tanks: 2

Total oil storage capacity aboveground [112.1 (d)]: 4,000.00 gallons

Total number of underground storage tanks: none

Total oil storage capacity underground [112.1 (d)]: N/A gallons

Total number of small containers and transformers: 1200 gal. AST (11) includes 53 gal. drum

Total oil storage capacity of small containers and transformers [112.1 (d)]: 1200.00 gallons

Does the facility have an SPCC Plan prepared [112.6 (d)]: ..... Y ☒ N ☐

Is an SPCC Plan available for review [112.6 (d)]: ..... Y ☒ N ☐

Hours Facility manned: 0600 - 24:00hrs

Is the SPCC Plan available during a normal 8 hour day? [112.3 (e)] ..... Y ☒ N ☐

SPCC Plan Certified [112.3 (d)]: ..... Y ☐ N ☐

Date Certified: 6/16/96

Name of Engineer: Daniel A. Lindsay

License Number: 249016 State: OH

SPCC Plan reviewed every three years [112.5 (b)]: ..... Y ☐ N ☐ ?

Record of SPCC Plan review available: ..... Y ☐ N ☐ ?

Has a spill of more than 1000 gallons occurred at the facility in the last 12 months? ..... Y\_\_\_ N\_\_\_

If yes, date of spill: \_\_\_\_\_

Was an amended Plan submitted per 40 CFR 112.4? ..... Y\_\_\_ N\_\_\_

Have two spills of harmful quantities occurred at the facility in the past 12 months? ..... Y\_\_\_ N\_\_\_

If yes, dates of spills: \_\_\_\_\_

Was an amended Plan submitted per 40 CFR 112.4? ..... Y\_\_\_ N\_\_\_

Has there been a change in the facility design, construction, operation, maintenance which could affect the facility's potential for discharge since the Plan was last certified? ..... Y\_\_\_ N\_\_\_

If yes, describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date of Latest Change: \_\_\_\_\_ Date Plan Amended: \_\_\_\_\_

Does the Plan include a written description of past spill events, corrective actions taken, and prevention measures provided within the last 12 months of review [112.7 (a)]? ..... Y\_\_\_ N\_\_\_

What is the general spill history of the facility? ..... Y\_\_\_ N\_\_\_

Does the plan include a prediction of equipment failure(s) which could result in a discharge from the facility per 40 CFR 112.7(b)? ..... Y\_\_\_ N\_\_\_

Does the plan discuss appropriate containment and/or diversionary structures or equipment [see page 11 for examples] per 40 CFR 112.7(c)? ..... Y\_\_\_ N\_\_\_

Was the installation of structures or equipment listed in 112.7 (c) determined to be impracticable [112.7 (d)]? ..... Y\_\_\_ N\_\_\_

If yes, has impracticability been clearly demonstrated? ..... Y\_\_\_ N\_\_\_

If yes, has a contingency plan per 40 CFR 109 been provided [112.7 (d)(1)]? ..... Y\_\_\_ N\_\_\_

If yes, has a written commitment of manpower been provided [112.7 (d)(2)]? ..... Y\_\_\_ N\_\_\_

General notes/comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

The following information directly reflects the requirements of 40 CFR 112 as applicable to the facility inspected.

The SPCC Plan must include complete discussion of the following [applicable] guidelines, spill prevention, containment procedures, or State rules, regulations or guidelines (if more stringent):

**Facility Drainage, Onshore (excluding production facilities) [112.7 (e)(1)]:**

- (e)(1)i. Is drainage from diked storage areas achieved via valves? ..... Y ☒ N ☐
- (e)(1)ii. Is drainage from diked areas achieved via pumps or ejectors? ..... Y ☐ N ☒
- (e)(1)iii. Are the pumps or ejectors manually operated? ..... Y ☐ N ☒ N/A
- (e)(1)iv. Are the valves manually operated? ..... Y ☒ N ☐
- (e)(1)v. Is storm water inspected for oil prior to discharge? ..... Y ☐ N ☒ ?
- (e)(1)vi. Does drainage from undiked areas flow into catchment basins? ..... Y ☐ N ☒
- (e)(1)vii. If dikes or catchment basins are not utilized, is there a diversion system to return spills to the facility? ..... Y ☐ N ☒ N/A
- (e)(1)viii. Is drainage water treated at the facility? ..... Y ☐ N ☒

Inspector's comments on Facility Drainage, Onshore (excluding production facilities), based upon inspection:

*Develop SOP to deal with the discharge of accumulating water in diesel fuel tanks secondary containment*

**Bulk Storage Tanks, Onshore (excluding production facilities) [112.7 (e)(2)]:**

- (e)(2)i. Are the materials and construction of tanks compatible with the oil and the conditions of storage? ..... Y ☒ N ☐
- (e)(2)ii. Do all tank installations have secondary containment? ..... Y ☒ N ☐
- Does the secondary containment appear to be adequate? ..... Y ☒ N ☐
- Are diked areas sufficiently impervious? ..... Y ☒ N ☐
- (e)(2)iii. Is there drainage from diked areas to on-site treatment? ..... Y ☐ N ☒
- A. If no, is the bypass valve normally sealed closed? ..... Y ☒ N ☐
- B. Is drainage from the diked area inspected for oil? ..... Y ☐ N ☐
- NPDES Permit #: \_\_\_\_\_ N/A
- C. Is the bypass valve is opened and resealed under supervision? ..... Y ☐ N ☐
- D. Are adequate records of the dike drainage maintained? ..... Y ☐ N ☐
- (e)(2)iv. Are there any underground tanks (USTs) at this facility? ..... Y ☐ N ☒
- Are the USTs protected from corrosion? ..... Y ☐ N ☐
- Is cathode protection or coating provided for new USTs? ..... Y ☐ N ☐
- Are the USTs pressure tested periodically? ..... Y ☐ N ☐
- (e)(2)v. Are there partially buried tanks at this facility? ..... Y ☐ N ☐

**Bulk Storage Tanks, Onshore (excluding production facilities) [112.7 (e)(2)] continued:**

- (e)(2)vi. Are there aboveground tanks (ASTs) at this facility? ..... Y ☒ N ☐
- Are the ASTs subject to periodic integrity testing? ..... Y ☐ N ☒
- Are records of these inspections maintained? ..... Y ☐ N ☒
- (e)(2)vii. Are internal heating coils utilized? ..... Y ☐ N ☒
- If yes, is steam return/exhaust monitored? ..... Y ☐ N ☒
- Are external heating systems utilized? ..... Y ☐ N ☒
- (e)(2)viii. Do tanks have "fail-safe" devices? ..... Y ☐ N ☐
- A. By audible high liquid level alarm? ..... Y ☐ N ☒
- By visual high liquid level alarm? ..... Y ☒ N ☐
- B. By automatic high liquid level pump cutoff? ..... Y ☐ N ☒
- C. By communications between gauger and pumping station? ..... Y ☐ N ☒
- D. By a system of determining liquid level in tanks, such as:
- Sensing devices? ..... Y ☐ N ☒
- Direct vision gauges? ..... Y ☒ N ☐
- E. Are the sensing devices and/or gauges tested regularly? ..... Y ☐ N ☒
- (e)(2)ix. Are the effluents that are discharged directly to navigable waters observed frequently to detect oil spills? ..... Y ☒ N ☒
- (e)(2)x. Are the causes of oil leaks resulting in accumulations of oil in diked areas promptly corrected? ..... Y ☒ N ☐
- (e)(2)xi. Are there mobile or portable tanks present at this facility? ..... Y ☒ N ☒
- If yes, are they positioned so as to prevent spilled oil from reaching navigable water? .. Y ☒ N ☐
- Is a secondary means of containment utilized? ..... Y ☒ N ☐

Inspector's comments on Bulk Storage Tanks, Onshore (excluding production facilities), based upon inspection: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Oil production Facilities, Onshore [112.7 (e)(5)]:**

- (e)(5)ii. A. Are drainage from secondary containment systems at tank batteries and central treatment stations closed and sealed at all times except when rainwater is being drained? ..... Y\_\_\_ N\_\_\_  
Is rainwater inspected for oil before drainage from secondary containment? ..... Y\_\_\_ N\_\_\_  
Prior to drainage, is accumulated oil on the rainwater picked up and returned to storage or disposed of properly? ..... Y\_\_\_ N\_\_\_  
B. Are field drainage ditches, road ditches, and oil traps, sumps or skimmers regularly inspected for oil? ..... Y\_\_\_ N\_\_\_  
Is accumulated oil removed? ..... Y\_\_\_ N\_\_\_

(e)(5)iii. Aboveground tanks:

- A. Are the materials and construction compatible with the oil stored and the conditions of storage? ..... Y\_\_\_ N\_\_\_  
B. Does secondary means of containment appear adequate? ..... Y\_\_\_ N\_\_\_  
C. Are tank inspections conducted periodically? ..... Y\_\_\_ N\_\_\_  
By a competent person? ..... Y\_\_\_ N\_\_\_  
Includes tank foundation and supports? ..... Y\_\_\_ N\_\_\_  
D. Are tank battery installations fail-safe engineered? ..... Y\_\_\_ N\_\_\_  
(1) Are tank capacities adequate to prevent tank overfill? ..... Y\_\_\_ N\_\_\_  
(2) Are overflow equalizing lines present between tanks? ..... Y\_\_\_ N\_\_\_  
(3) Is vacuum protection available to prevent tank collapse? ..... Y\_\_\_ N\_\_\_  
(4) Are tanks equipped with high level alarms? ..... Y\_\_\_ N\_\_\_

(e)(5)iv. Facility transfer operations:

- Are aboveground valves/pipelines examined periodically? ..... Y\_\_\_ N\_\_\_  
Are brine disposal facilities examined often? ..... Y\_\_\_ N\_\_\_  
Has a flowline maintenance program been established? ..... Y\_\_\_ N\_\_\_  
Are records of inspection maintained? ..... Y\_\_\_ N\_\_\_

Inspector's comments on Oil Production Facilities, Onshore, based upon inspection: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Oil Drilling and Workover Facilities, Onshore [112.7 (e)(6)]:**

- (e)(6)i. Is mobile drilling/workover equipment positioned to prevent spilled oil from entering waters? ..... Y\_\_\_ N\_\_\_  
(e)(6)ii. Is secondary containment utilized? ..... Y\_\_\_ N\_\_\_  
(e)(6)iii. Is a Blowout prevention (BOP) assembly utilized? ..... Y\_\_\_ N\_\_\_  
(e)(6)iv. Is a well control system utilized? ..... Y\_\_\_ N\_\_\_

\*NOTE: casing and BOP installation should be in accordance with State regulatory agency requirements

Inspector's comments on Oil Drilling and Workover Facilities, Onshore, based upon inspection: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



**Facility Transfer Operations, Pumping and In-Plant Processes, Onshore (excluding production facilities) [112.7(e)(3)]:**

- (e)(3)i. Are buried pipelines corrosion protected? ..... *N/A* ..... Y ☐ N ☒
- (e)(3)ii. Are not-in-service pipelines capped or blank-flanged and marked as their origin? ..... Y ☒ N ☐
- (e)(3)iii. Are pipe supports designed to minimize abrasion and corrosion and allow for expansion and contraction? ..... Y ☒ N ☐
- (e)(3)iv. Are aboveground pipelines inspected regularly? ..... ? Y ☒ N ☐
- Are periodic pressure testing of pipelines conducted? ..... Y ☒ N ☐
- (e)(3)vi. Are there aboveground tanks (ASTs) at this facility? ..... Y ☒ N ☐
- Are the ASTs subject to periodic integrity testing? ..... Y ☒ N ☐
- Are records of these inspections maintained? ..... Y ☒ N ☐
- (e)(3)v. Is vehicle traffic warned of aboveground pipelines? ..... ? Y ☒ N ☐

Inspector's comments on Facility Transfer Operations, Pumping and In-Plant Processes, Onshore (excluding production facilities), base upon inspection:

*lockage signal to warn ASTs, inspect and keep records of aboveground pipeline conditions, include integrity testing records on Plan*

**Facility Tank Car and Tank Truck Loading/Unloading Rack, Onshore [112.7 (e)(4)]:**

- (e)(4)i. Does rack comply with DOT regulations? ..... Y ☒ N ☐
- (e)(4)ii. Does rack drainage flow to catchment basin? ..... Y ☒ N ☐
- Does rack drainage flow to treatment system? ..... Y ☐ N ☒ *N/A*
- If the rack drainage does not flow into to a catchment basin or treatment system, then is secondary containment used? ..... Y ☐ N ☒
- (e)(4)iii. Is a system used to prevent vehicular departure before complete disconnect from transfer lines? ..... Y ☐ N ☒
- By interlock warning lights? ..... Y ☐ N ☒
- By a physical barrier system? ..... Y ☐ N ☒
- By warning signs? ..... Y ☒ N ☐
- (e)(4)iv. Are vehicles inspected before departing facility? ..... Y ☒ N ☐

Inspector's comments of Facility Tank Car and Tank Truck Loading/Unloading Rack, Onshore, based upon inspection:

*Develop procedures for outside parties to follow when delivery fuel and locate sign to warn driver of leaving the site without de-faching fuel hose*

**Oil Drilling and Workover Facilities, Offshore [112.7 (e)(7)]:**

- (e)(7)ii. Is oil drainage collection equipment utilized? ..... Y\_\_\_ N\_\_\_  
Are drains controlled/directed to central collection? ..... Y\_\_\_ N\_\_\_
- (e)(7)iii. If a sump system is used, is it adequately sized? ..... Y\_\_\_ N\_\_\_  
Is a spare pump or equivalent method available? ..... Y\_\_\_ N\_\_\_
- (e)(7)iv. Are separators/treaters equipped with dump valves? ..... Y\_\_\_ N\_\_\_  
Are measures in place in the event that a dump valve would fail? ..... Y\_\_\_ N\_\_\_
- (e)(7)v. Are atmospheric storage/surge tanks equipped with high level sensing devices? ..... Y\_\_\_ N\_\_\_
- (e)(7)vi. Are pressure tanks equipped with high and low pressure sensing devices? ..... Y\_\_\_ N\_\_\_
- (e)(7)vii. Are the tanks protected against corrosion? ..... Y\_\_\_ N\_\_\_
- (e)(7)viii. Has a written procedure for inspecting and testing pollution prevention equipment  
and systems been prepared? ..... Y\_\_\_ N\_\_\_  
Are written procedures for these inspections maintained at the facility? ..... Y\_\_\_ N\_\_\_  
Are these written procedures included in SPCC Plan? ..... Y\_\_\_ N\_\_\_
- (e)(7)ix. Are inspections and tests conducted periodically? ..... Y\_\_\_ N\_\_\_
- (e)(7)x. Are surface and subsurface/well shut-in valves and devices sufficiently described? ..... Y\_\_\_ N\_\_\_  
Are detailed records for each well maintained? ..... Y\_\_\_ N\_\_\_
- (e)(7)xi. Is the Blowout prevention (BOP) assembly utilized in accordance with State  
regulatory agency requirements? ..... Y\_\_\_ N\_\_\_
- (e)(7)xii. Are well control measures provided in the event of emergency conditions? ..... Y\_\_\_ N\_\_\_
- (e)(7)xiii. Have written instructions for contractors and subcontractors been prepared by  
the owner or operator? ..... Y\_\_\_ N\_\_\_  
Are such instructions maintained at the facility? ..... Y\_\_\_ N\_\_\_
- (e)(7)xiv. Are manifolds equipped with check valves? ..... Y\_\_\_ N\_\_\_
- (e)(7)xv. Are flowlines equipped with high pressure sensing devices and shutin valves at  
the wellhead? ..... Y\_\_\_ N\_\_\_  
If no, is a pressure release system provided? ..... Y\_\_\_ N\_\_\_
- (e)(7)xvi. Are pipelines corrosion protected? ..... Y\_\_\_ N\_\_\_
- (e)(7)xvii. Are sub-marine pipelines stress protected? ..... Y\_\_\_ N\_\_\_
- (e)(7)xviii. Are sub-marine pipelines inspected periodically? ..... Y\_\_\_ N\_\_\_  
Are inspections documented and maintained? ..... Y\_\_\_ N\_\_\_

Inspector's comments on Oil Drilling and Workover Facilities, Offshore, based upon inspection: \_\_\_\_\_

**Inspection and Records [112.7 (e)(8)]:**

Are inspections in accordance with written procedures developed for the facility? ..... Y ☒ N ☐

Are written procedures and a record of inspections signed by the appropriate supervisor or inspector? ..... Y ☐ N ☒

Are written procedures and a record of inspections made part of the SPCC Plan? ..... Y ☐ N ☐

Are written procedures and a record of inspections maintained for a period of three years? ..... Y ☐ N ☐

Inspector's comments on Inspections and Records, based upon inspection: \_\_\_\_\_

*develop inspection written procedures (check list)*  
*expand on recordkeeping.*

**Security (excluding oil production facilities) [112.7 (e)(9)]:**

(e)(9)i. Is the facility fully fenced? ..... Y ☒ N ☐

Are entrance gates locked and/or guarded when the facility is not in production or is unattended? ..... Y ☒ N ☐

(e)(9)ii. Are the master flow and drain valves securely locked in closed position when in a non-operating or non-standby status? ..... Y ☒ N ☐

(e)(9)iii. Are starter controls on pumps locked in the "off" position or located at a site accessible only to authorized personnel when the pumps are in non-operating or non-standby status? ..... Y ☒ N ☐

(e)(9)iv. Are loading/unloading connections of pipelines capped or blank-flanged when not in service or standby service? ..... Y ☒ N ☐

(e)(9)v. Does facility lighting appear to be adequate to facilitate the discovery of spills during hours of darkness and to deter vandalism? ..... Y ☒ N ☐

Inspector's comments on Security (excluding oil production facilities), based upon inspection: \_\_\_\_\_

**Personnel Training and Spill Prevention Procedures [112.7 (e)(10)]:**

(e)(10)i. Are personnel properly instructed in applicable pollution control laws, rules, and regulations and the operation and maintenance of the equipment used to prevent oil discharges? ..... Y ☐ N ☒

(e)(10)ii. Is a person designated in the plan as accountable for spill prevention? ..... Y ☐ N ☐  
Name: \_\_\_\_\_ Title: \_\_\_\_\_

(e)(10)iii. Are spill prevention briefings scheduled periodically? ..... Y ☐ N ☒  
Are personnel training records kept? ..... Y ☐ N ☒

Inspector's comments on Personnel Training and Spill Prevention Procedures, based upon inspection: \_\_\_\_\_

The following information is for the inspection of the facility. Note if facility is implementing their SPCC Plan.

**Aboveground Storage Tank and Appurtenances Inspection Checklist:**

1. Check tanks for leaks, specifically looking for:

- a. Drip marks and stains [112.7 (e)(2)(x)] ..... Y ☐ N ☒
- b. Discolorations of tanks [112.7 (e)(2)(ii)] ..... Y ☐ N ☒
- c. Puddles of stored material [112.7 (e)(2)(x)] ..... Y ☐ N ☒
- d. Corrosion [112.7 (e)(2)(ii)] ..... Y ☐ N ☒
- e. Cracks [112.7 (e)(2)(1)] ..... Y ☐ N ☒
- f. Localized dead vegetation ..... Y ☐ N ☒

2. Check Foundations for:

- a. Cracks [112.7 (e)(2)(ii)] ..... *# metal secondary containment* Y ☐ N ☐
- b. Settling [112.7 (e)(2)(i)] ..... *N/A* Y ☐ N ☐
- c. Gaps between tank and foundation ..... *N/A* Y ☐ N ☐
- d. Puddles of stored material [112.7 (e)(2)(x)] ..... Y ☐ N ☐
- e. Discoloration [112.7 (e)(2)(1)] ..... Y ☐ N ☐

3. Check pipes and valves for:

- a. Droplets of stored material [112.7 (e)(2)(x)] ..... Y ☐ N ☒
- b. Discoloration [112.7 (e)(3)(iii)] ..... Y ☐ N ☒
- c. Corrosion [112.7 (e)(3)(iii)] ..... Y ☐ N ☒
- d. Bowing of pipes between supports [112.7 (e)(3)(iii)] ..... Y ☐ N ☐
- e. Presence of stored material on valves ..... Y ☐ N ☒
- f. Evidence of leakage at joints and seams [112.7 (e)(2)(x)] ..... Y ☐ N ☒
- g. Localized dead vegetation ..... Y ☐ N ☒
- h. Caps or blank-flanges on tanks on stand-by [112.7 (e)(3)(ii)] ..... Y ☐ N ☒

Inspector's comments on Aboveground Storage Tank and Appurtenances, based upon inspection: \_\_\_\_\_

Inspector's comments on Underground Storage Tank and Appurtenances, based upon inspection: \_\_\_\_\_

**Secondary Containment Checklist:**

**1. Secondary Containment (dike or berm system)**

- a. Capacity adequate (Fill out Containment Volume Calculation Worksheet attached) [112.7 (e)(2)(ii)] ..... Y ☒ N ☐
- b. Drainage mechanism manually operated [112.7 (e)(1)(ii)] ..... Y ☒ N ☐
- c. Floor and walls sufficiently impervious to stored materials [112.7 (e)(2)(iii)] ..... Y ☒ N ☐
- d. Presence of stored material within dike or berm [112.7 (e)(2)(x)] ..... Y ☐ N ☒
- e. Standing water within dike or berm [112.7 (e)(2)(iii)] ..... Y ☒ N ☐
- f. Debris within the dike or berm areas [112.7 (e)(2)(ii)] ..... Y ☐ N ☒
- g. Erosion or corrosion of dike or berm [112.7 (e)(2)(ii)] ..... Y ☐ N ☒
- h. Temporary secondary containment for portable tanks [112.7 (e)(2)(xi)] ..... Y ☐ N ☒ N/A

**2. Secondary Containment (other systems such as most, catch-basin, pond, etc.)**

- a. Capacity adequate (Fill out Containment Volume Calculation Worksheet attached) [112.7 (e)(2)(ii)] ..... Y ☐ N ☐
- b. Drainage mechanism manually operated [112.7 (e)(1)(ii)] ..... N/A Y ☐ N ☐
- c. Presence of stored material within secondary containment [112.7 (e)(2)(x)] ..... Y ☐ N ☐
- d. Standing water within the secondary containment system [112.7 (e)(2)(ii)] ..... Y ☐ N ☐
- e. Debris within the secondary containment system [112.7 (e)(2)(ii)] ..... Y ☐ N ☐
- f. Erosion or corrosion of the secondary containment system [112.7 (e)(2)(ii)] ..... Y ☐ N ☐

**3. Secondary Containment (drainage systems)**

- a. Drainage adequate to return spilled material to facility [112.7 (e)(1)(iv)] ..... N/A Y ☐ N ☐

**4. Secondary Containment (none or inadequate)**

- a. Demonstration of impracticability [112.7 (d)] ..... Y ☐ N ☐
- b. Contingency Plan developed per 40 CFR 109 [112.7 (1)] ..... N/A Y ☐ N ☐
- c. Written commitment [112.7 (2)] ..... Y ☐ N ☐

Inspector's comments on Secondary Containment, based upon inspection: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Loading Rack Inspection Checklist:**

**1. Check loading rack area for:**

- a. warning signs for vehicles to avoid piping [112.7 (e)(3)(v)] ..... Y ☒ N ☐
- b. secondary containment system at the loading rack [112.7 (e)(4)(iii)] ..... Y ☒ N ☐
- c. system to prevent vehicular departure before disconnect of transfer lines [112.7 (e)(4)(iii)] ..... Y ☐ N ☒
- d. puddles of stored material at the rack area [112.7 (e)(2)(x)] ..... Y ☐ N ☒

Inspector's comments of the facility's loading rack, based upon inspection: \_\_\_\_\_

**Security Measures Inspection Checklist:**

**1. Check security measures for:**

- a. fencing around the facility is secure and in good condition [112.7 (e)(9)(i)] ..... Y ☒ N ☐
- b. starter controls on pumps are locked or only accessible to facility personnel [112.7 (e)(9)(iii)] ..... Y ☒ N ☐
- c. light fixtures around the oil storage and rack areas which are adequate to discover spills and discourage vandalism [112.7 (e)(9)(v)] ..... Y ☒ N ☐

Inspector's comments of the facility's security measures, based upon inspection: \_\_\_\_\_

Has the facility completed its certification of Substantial Harm Determination form and made it part of the SPCC Plan? ..... Y \_\_\_ N \_\_\_

If yes, no further action anticipated.

If no, provide the owner or operator the copy of the form below.

This form must be completed, certified, and attached to the SPCC Plan to be submitted to the SPCC Coordinator.

**Certification of the Applicability of the Substantial Harm Criteria**

Facility Name: \_\_\_\_\_

Facility Addresses: \_\_\_\_\_

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

Yes \_\_\_ No \_\_\_

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

Yes \_\_\_ No \_\_\_

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula 1) such as that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environment" (see Appendix E to this part, section 10, for availability) and the applicable Area Contingency Plan.

Yes \_\_\_ No \_\_\_

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula 1) such that a discharge from the facility would shut down a public drinking water intake?

Yes \_\_\_ No \_\_\_

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes \_\_\_ No \_\_\_

**Certification**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature: \_\_\_\_\_

Name (Please type or print): \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

1 If comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

# CONTAINMENT VOLUME CALCULATION WORKSHEET

Rectangle:  $l \times w \times h$

$$\text{volume (gallons)} = \text{length(ft)} \times \text{width(ft)} \times \text{height(ft)} \times 7.48 \text{ gallons/ft}^3$$

Circle:  $\pi r^2 \times h$ , where  $\pi = 3.14159$

$$\text{volume (gallons)} = 3.14159 \times \text{radius}^2(\text{ft}^2) \times \text{height(ft)} \times 7.48 \text{ gallons/ft}^3$$

Right Triangle:  $(l \times w \times d) \div 2$

$$\text{volume (gallons)} = [(\text{length(ft)} \times \text{width(ft)} \times \text{depth(ft)}) \div 2] \times 7.48 \text{ gallons/ft}^3$$

Displacement volume by all tanks within dike other than the largest tank:  $V_D = (V_{T1}) + (V_{T2}) + (V_{T3}) + \dots$

$$\text{volume}_D = [(\pi r_{T1}^2 \times \text{height of the dike}) + (\pi r_{T2}^2 h) + (\pi r_{T3}^2 h) + \dots] \times 7.48 \text{ gallons/ft}^3$$

Dike Capacity:  $V_C - V_D$

$$\text{capacity (gallons)} = \text{calculated volume of based on shape of dike (gal)} - \text{displacement volume (gal)}$$

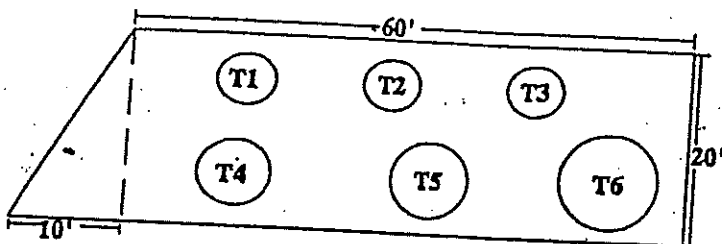
where: Volumes:

$$\begin{aligned} T1 &= 1,000 \text{ gal} & T2 &= 1,000 \text{ gal} & T3 &= 1,000 \text{ gal} \\ T4 &= 6,000 \text{ gal} & T5 &= 8,000 \text{ gal} & T6 &= 15,000 \text{ gal} \end{aligned}$$

Diameters:

$$T1, T2, T3 = 4' \quad T4 = 6' \quad T5 = 8' \quad T6 = 10.5'$$

Dike Height = 2'



Dike Volume:

$$(60' \times 20' \times 2') + [(10' \times 20' \times 2') \div 2] = 2,600 \text{ ft}^3 \times 7.48 \text{ gal/ft}^3 = 19,448 \text{ gal}$$

Displacement Volume:

$$3(\pi 2\text{ft}^2 \times 2\text{ft}) + (\pi 3\text{ft}^2 \times 2\text{ft}) + (\pi 4\text{ft}^2 \times 2\text{ft}) = 232.48\text{ft}^3 \times 7.48 \text{ gal/ft}^3 = 1,739 \text{ gal}$$

Dike Capacity:

$$19,448 \text{ gal} - 1,739 \text{ gal} = 17,709 \text{ gal} ; 17,709/15,000 \times 100 = 118\% \text{ containment volume of largest tank.}$$



# CONTAINMENT VOLUME CALCULATION WORKSHEET

Facility: \_\_\_\_\_ Inspection Date: \_\_\_\_\_

Area # \_\_\_\_\_ Largest Tank Capacity: \_\_\_\_\_ Dike Capacity: \_\_\_\_\_

Area # \_\_\_\_\_ Largest Tank Capacity: \_\_\_\_\_ Dike Capacity: \_\_\_\_\_

# CONTAINMENT VOLUME CALCULATION WORKSHEET

Facility: \_\_\_\_\_ Inspection Date: \_\_\_\_\_

Area # \_\_\_\_\_ Largest Tank Capacity: \_\_\_\_\_ Dike Capacity: \_\_\_\_\_

Area # \_\_\_\_\_ Largest Tank Capacity: \_\_\_\_\_ Dike Capacity: \_\_\_\_\_



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive  
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

August 18, 1995

Mr. James R. Stayton  
SK Hand Tool Corporation  
135 Hickory Street  
Defiance, Ohio 43512

RE: SPCC File  
Defiance County  
SK Hand Tool Corporation

*2108/18*

Dear Mr. Stayton:

On August 8, 1995, I conducted a Spill Prevention Control and Countermeasure (SPCC) inspection at your facility. This letter is to advise you of the findings of this inspection.

Title 40, Code of Federal Regulations, Part 112 require any facility that is capable of storing oil in excess of 660 gallons in a single container, or 1320 gallons aggregate (aboveground), or 42,000 gallons underground to prepare and implement an SPCC plan. This plan requires a secondary containment structure of sufficient size to hold 110% of the single largest container, (This would also apply to your plastic waste oil overflow tank at your hammermill operation site that you and I discussed during my visit to the plant). A written spill prevention plan should be prepared and kept at the facility if manned at least 8 hours per day. The written SPCC plan must be reviewed and certified by a Professional Engineer. SK Hand Tool Corporation appears to be subject to this regulation based on the capacity of the aboveground storage tanks.

A written SPCC plan should be prepared for your facility and a secondary containment structure installed around the plastic waste oil tank. The written spill plan should include facility layout (site map), operating procedures, inventory, contingency plan, management commitment statement, etc.

James R. Stayton

Page 2

Please refer to the SPCC fact sheet and sample SPCC plan that I left with you for guidance in developing your SPCC plan. Please submit a complete copy of the written SPCC plan within ninety days of receipt of this letter. If I may be of assistance, please feel free to contact me at 614/644-3063.

Sincerely,



Kevin C. Zumbro

SPCC Coordinator

Chemical Emergency Prevention Unit

Division of Emergency & Remedial Response



# INITIAL POLLUTION INCIDENT REPORT

SPILL I.D #: 9505-20-2121

DISTRICT: NW

REPORTED BY: NED SPIESER  
TITLE: DIRECTOR  
TELEPHONE: 419-769-0050  
AFFILIATION: LEPC

REPORTED: 05/25/95 12:46  
DISCOVERED: 05/25/95 11:30  
OCCURRED: 05/25/95 UNK

DID SPILLER REPORT? N

COMPLAINT? Y

PRIORITY: 3

SUSPECTED SPILLER: SK WAYNE

MAILING ADDRESS:

TELEPHONE:

COUNTY: DEFIANCE

TOWNSHIP: DEFIANCE

LOCATION: 5 BLOCKS N OF THE INTERSECTION OF BIDEA AVE & E 2ND ST

SOURCE: PIPING (UNDERGROUND)

CAUSE: LEAK

REASON: DAMAGED EQUIPMENT

LATITUDE:

LONGITUDE:

WATERWAY AFFECTED: PRESTON RUN

MEDIA AFFECTED: SURFACE WATER/STORM SEWERS

DID YOU TELL THE SPILLER TO CALL THE N.R.C.? N LOCAL EPC? N BUSINESS:Y SARA REPORT: Y

RECEIVED BY: HENDRICKSON, SHARON

## PRODUCT SPILLED

PRODUCT	AMOUNT	UOM	REPORTABLE QTY	SIZE	TYPE	EHS
DIESEL FUEL	500.0	GAL	/	M	H	

## OTHER AGENCIES NOTIFIED

AGENCY	DATE	TIME	PERSON
RTK			JEFF BEATTIE

## REMARKS

SK WAYNE HAD LINE LEAK TO STORM SEWER, INTO PRESTON RUN (MAUMEE TRIB) .5 MI LONG SHEEN. LEPC EST 500-600 GAL HAS LEAKED. HAVE CREEK BOOMED. SPIESER CAN BE REACHED THROUGH SHERIFFS OFFICE: 419-784-1155 IF WE CANNOT REACH HIM ON HIS CELL PHONE.

MIKE GERBER WAS NOTIFIED



# INITIAL POLLUTION INCIDENT REPORT

SPILL I.D #: 9505-20-2121 / 1

DISTRICT: NW

REPORTED BY: JAMES R STAYTON

REPORTED: 05/25/95 14:10

TITLE: SUPERVISOR

DISCOVERED: 05/25/95 11:30

TELEPHONE: 419-784-1122

OCCURRED: 05/25/95 UNK

AFFILIATION: COMPANY

DID SPILLER REPORT? Y

COMPLAINT? N

PRIORITY: 3

SUSPECTED SPILLER: SK HANDTOOLS

MAILING ADDRESS: 135 HICKORY ST

DEFIANCE

OH 43512

TELEPHONE: 419-784-1122

COUNTY: DEFIANCE

TOWNSHIP: DEFIANCE

LOCATION: 5 BLOCKS N OF THE INTERSECTION OF BIDEA AVE & E 2ND ST

SOURCE: PIPING (UNDERGROUND)

CAUSE: LEAK

REASON: DAMAGED EQUIPMENT

LATITUDE:

LONGITUDE:

WATERWAY AFFECTED: PRESTON RUN

MEDIA AFFECTED: SURFACE WATER/STORM SEWERS

DID YOU TELL THE SPILLER TO CALL THE N.R.C.? N LOCAL EPC? N BUSINESS:Y SARA REPORT: Y

RECEIVED BY: HENDRICKSON, SHARON

## PRODUCT SPILLED

PRODUCT	AMOUNT	UOM	REPORTABLE QTY	SIZE	TYPE	EHS
DIESEL FUEL	500.0	GAL		M	H	

## OTHER AGENCIES NOTIFIED

AGENCY	DATE	TIME	PERSON
RTK			JEFF BEATTIE
SPCC			KEVIN ZUMBRO
PIC			JIM LEACH
DSW/WW			E WICK

## REMARKS

COUSINS WASTE CONTROL CONTRACTED TO DO CLEANUP...600 GAL LOST FROM HEATING OIL TANK...IN PRESTON RUN CLOSE TO WHERE IT FLOWS INTO MAUMEE. HAVE CREEK BOOMED, ARE BRINGIN IN ANOTHER BOOM. BACKFLOW FROM HIGH WATER AND WINDS PREVENTED SOME OF DIESEL FUEL FROM ENTERING MAUMEE. DAVID E BIDLACK IS ANOTHER COMPANY OFFICIAL WORKING WITH GERBER. DEFIANCE AND S RICHLAND FD ARE ALSO WORKING ON SPILL.

# SPCC INSPECTION FIELD SHEET

To be completed by

C Regulation is applicable to Facility - see 40CFR Part 112.1.

SEE INSTRUCTIONS ON REVERSE

13. NAME OF FACILITY

SK Handtools

10. TYPE OF FACILITY

Tool Manufacturing

16. FACILITY LOCATION

135 Hickory St. Defiance County, Defiance

23. NAME OF OWNER AND/OR OPERATOR RESPONSIBLE FOR FACILITY

James R. Stayton

20. TELEPHONE NUMBER

Area Code 1419 784-1122

20. MAILING ADDRESS

135 Hickory St. Defiance, Ohio 43510

3. TYPES OF OIL STORED AND CAPACITY OF ABOVEGROUND AND BURIED STORAGE.

1 x 2000 gallon - Diesel Supreme  
1 x 2000 gallon - #2 Fuel Oil

4. IS A CERTIFIED SPCC PLAN AVAILABLE FOR INSPECTION? ☐ YES ☒ NO

5. DATE OF INSPECTION

6. NAME AND REGISTRATION NUMBER OF CERTIFYING ENGINEER ☒ NOT AVAILABLE

7. DATE SPCC PLAN WAS CERTIFIED ☐ NOT AVAILABLE

8. IS SPCC PLAN FULLY IMPLEMENTED? (Are the items called for in the Plan in the interest of spill prevention actually installed - if observable?)  
☐ NOT APPLICABLE

9. NAME OF WATER BODY THAT POTENTIAL SPILL COULD ENTER; OR IF UNNAMED TRIBUTARY, THEN FIRST NAMED WATERBODY DOWNSTREAM (if known)

Preston Run -> Maumee River

10. COMMENTS (include comments by owner/operator - write on back or attach extra sheets if needed)

Company has no SPCC plan in place

Gave company 30 days to prepare plan

11. SPCC NO.

11b. CASE NO.

11c. NPDES NO. ☐ NOT AVAILABLE

12. INSPECTOR (print)

12b. DATE

12c. INSPECTOR (print)

2. RECEIVING WATER (should a spill occur)

2a. NAME AND/OR DESCRIPTION

SR 15 → 1st Light  
 Hocking → right → up the Street → 2 4th  
 stop  
 → Right on to Hickocky

- ☐ Perennial ☐ Intermittent
- ☐ Water present at time of inspection
- ☐ Inspector traced discharge to receiving water
- ☐ Inspector traced apparent drainage path to receiving water
- ☐ Receiving water identified by company representative
- ☐ Receiving water identified from topo maps
- ☐ Receiving water identified by other means (specify):

2b. PROBABLE FLOW PATH TO RECEIVING WATER

2c. CLIMATIC INFORMATION FROM OWNER/OPERATOR



# B. SPCC INSPECTION SUMMARY SHEET

SPCC NO.

CASE NO.

DATE OF INSPECTION

NAME OF INSPECTOR (Signature)

DATE OF DOCUMENTATION REPORT

NAME OF INSPECTOR (Print)

NPOES NO.

Kevin C. Zumbro

A. COMPANY

1. FACILITY

ADDRESS

CITY

TELEPHONE

STATE

ZIP CODE

FACILITY NAME

D. FACILITY LOCATION

PARENT CORPORATION

Facom

ADDRESS

CITY

Paris

STATE

France

ZIP CODE

C. WATER BODY PROTECTED

Preston Run

INITIATION:

☐ Routine Surveillance

☐ Coast Guard Information

☐ Spill Report

☐ Citizen Information

☐ Other (specify):

TYPE:

☐ Plan Preparation

☐ Plan Implementation

☐ Follow-up

☐ Plan Amendment

2. PURPOSE

INDIVIDUAL CONTACTED

James R. Stayton

3. INSPECTION

INDIVIDUAL CONTACTED

TITLE

Engineering Manager

TITLE

NOTIFICATION

## 4. FINDINGS

SOURCE IN APPARENT COMPLIANCE WITH SPCC REQUIREMENTS:

☐ Yes

☐ Have adequate plan

☐ Not subject to regulations

☐ Insufficient storage

☐ No reasonable spill expectation

☐ Plan fully implemented

☐ New facility operational less than 6 months

☒ No

☐ No plan

☐ Plan not properly certified

☐ Plan does not have management approval

☐ Plan not maintained at facility manned 8 hrs/day

☐ Inadequate plan (detailed SPCC Plan review attached)

☐ Plan not fully implemented

☐ Plan not reviewed within 3 years

☐ Other

## 5. ATTACHMENTS (None required if facility in apparent compliance)

NONE ATTACHED ALREADY ON FILE

\*Detailed Observations

\*Photographs

Slides

Map

\*Field Drawing

\*Comments

Telephone Conversations

\*SPCC Plan

(ALL REQUIRED IF FACILITY IS NOT IN APPARENT COMPLIANCE. If photos not permitted, check "None" and explain. Add "SPCC Plan" to List of Attachments when appropriate.)

## INSTRUCTIONS

1. Trade name of facility and its precise location, using geographical latitude and longitude if necessary.
2. If owner and operator are different persons, give information for both. State relation between them - is operator consignee, lessee, or employee? Who is responsible for SPCC?
3. Note capacity and whether tanks are full or not. Note tanks which store alternate oils. Check lube storage - whether buried or above-ground (*latter more likely*).
4. Note adequacy of Plan; if inadequate, state specific defects. Use 10. below for details.
5. Actual date of visit to facility.
6. Include state in which engineer is registered. If Plan was amended and the amended Plan certified by a different engineer, list information for all engineers.
7. List for original Plan and any amended Plans.
8. Summary of deficiencies in Plan implementation. Discuss this with operator and record his opinions and comments in 10. below.
9. Specify distance and direction to nearest named stream, river, lake, bayou, estuary, etc. which will receive runoff from the facility. If facility runoff goes to storm drain, ultimate receiving water should be named.
10. Space for comments by inspector and operator. Inspector should briefly list SPCC equipment actually in use at time of inspection. If facility was not in compliance, inspector should include expected dates of Plan preparation and/or implementation.
11. SPCC No. refers to national EPA Data Bank. Case No. refers to Regional EPA designation.
12. Date on which Field Sheet was actually completed.

10. COMMENTS (continued from other side)

# CALCULATION OF VOLUME OF SECONDARY TANKS

Name of Facility:

Area:	1	2	3	4
Volume of Largest Tank (gal):	<u>2000 gal</u>	<u>2000 gal</u>		

Dike Measurements:	Area	1	2	3	4
Height:		<u>2'6"</u>	<u>2'6"</u>		
Length:		<u>8'</u>	<u>8'</u>		
Width:		<u>16'</u>	<u>16'</u>		

$$V \text{ (gal)} = H \times L \times W \times 7.48 \text{ gal 1 ft}^3$$

## INSTRUCTIONS

- Page 1: **FACILITY DESCRIPTION**  
(a) Make detailed in narrative style; use extra sheets if needed.  
(b) Include all storage; indicate capacity and actual amount and type of oil in each tank, including tanks not in use - above-ground or buried. Indicate percent of oil in mixed storage and annual throughput where possible. If this information is included on attached drawing or lists, state this here.  
(c) Describe all types and adequacy of prevention measures - dikes, catchment areas, drainage systems, separators, tank level alarm systems, drainage pumps, etc. Describe major security measures taken - locks, guards, fencing, etc.  
(d) Describe maintenance at facility. Use such terms as "neat and well-maintained", "messy and poorly maintained" etc. Describe any unsatisfactory maintenance such as oil pools, broken dikes, etc.  
(e) Obtain statement about past spills at this facility; observe drain controls; look for evidence of past spills.
- Page 2: **RECEIVING WATER**  
(a) This should be a recognizable river, stream, lake, estuary, etc. which can be expected to contain water at least part of the year.  
(b) Explicitly describe, using approx. distances in meters or kilometers (*feet or miles*), all of the drainage paths from facility to receiving water or storm drain in (a).  
(c) Add here any statements obtained about annual rainfall, runoff, flooding, etc.
- Page 3: **COMMENTS**  
Describe soil conditions as they relate to spill runoff and whether spills have a reasonable chance of reaching drainage channels, storm drains or waterways. Obtain statements from owner/operator which indicate whether the person is aware of 40 CFR 112.
- Page 4: **SPCC PLAN REVIEW**  
State whether facility has an SPCC Plan and whether it is adequate. Describe in detail any inadequacies in SPCC Plan or its implementation. Include references to pertinent paragraphs of Spill Prevention Regulations.
- Page 5: **SPCC AMENDMENT RECOMMENDATIONS (*Amendment Inspection only*)**  
Describe areas of past and potential oil spills and corrective actions, preventive measures and countermeasures carried out in facility. Based on your inspection, will these features of the post-spill SPCC Plan adequately minimize the possibility of recurrence? Why? If not, state recommendations for SPCC Plan amendments in detail - attach quantitative information, drawings, etc.
- Page 6: **FIELD DRAWINGS (*attach more sheets if needed and show north arrow or other orientation*)**  
Show: all major features with spill potential requiring spill prevention measures; all drainage features that relate to potential spills, such as catch basins, storm drains, channels, ponding areas, dikes, sumps, etc.; the appropriate distances, in meters or kilometers (*feet or miles*) along drainage paths from spill potential areas to water course or water body in 2(a).
- Page 7: **PHOTOGRAPHS (*attach more sheets if needed*)**  
Show inadequate SPCC features, spills, poor maintenance, proximity to waterways, and so forth. Mount photographs on page 7; attach more sheets if needed.

7. PHOTOGRAPHS (Attach more sheets if needed)	
SUBJECT	FACILITY
PHOTOGRAPHER	WITNESSES
WITNESSES	WITNESSES
DATE/TIME/DIRECTION	CAMERA/FILM/ATTACHMENTS
SUBJECT	FACILITY
PHOTOGRAPHER	WITNESSES
WITNESSES	WITNESSES
DATE/TIME/DIRECTION	CAMERA/FILM/ATTACHMENTS

ATTACH PHOTOGRAPHS HERE



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## Printable Map

26427 State Route 281, Defiance, OH 43512

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**Zoom Level**

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### "So...what kind of animal are you?"



[Jaguar  
Bug  
Mustang](#)

[Bronco  
Pinto  
Sunbird](#)

[Gremlin  
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# PROVEN WASTE PROCESSING TECHNOLOGIES



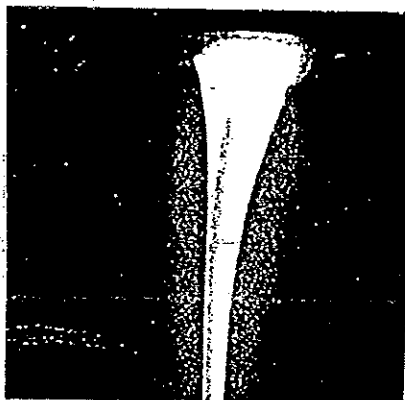
**Decontamination** - Decontamination, recycle, and reuse are superior to processing and burial because it saves costs and valuable resources. SEG has a multitude of effective mechanical and chemical decontamination methods to significantly reduce the total volume of non-compactible radioactive wastes requiring burial. Some processed materials may be released for beneficial reuse as radioactive materials to a licensed radioactive materials user such as the DOE. Other items may be decontaminated and free-released in accordance with NRC guidance specified in Regulatory Guide 1.86. We have decontaminated over 5,000,000 pounds of metals to date, reaching SEG unrestricted release limits for 80-99% of processed material.

**We have decontaminated over 5,000,000 pounds of metals...**



**Green is Clean Free Release Program** - Our "Green is Clean" program uses a Low Level Waste Analysis (LLWA) System employing HPGe gamma spectroscopy to verify that wastes meet free release requirements. The generator's 10 CFR 61 DAW waste characterization is used to create a generator-specific nuclide library which is updated as the generator performs periodic updates. Potentially clean wastes are processed through the "Green is Clean" program. Wastes with no detectable activity are shredded as clean waste and disposed of as SEG secondary waste in an industrial landfill. Samples of the shredded waste are analyzed to monitor 10 CFR 61 characterization.

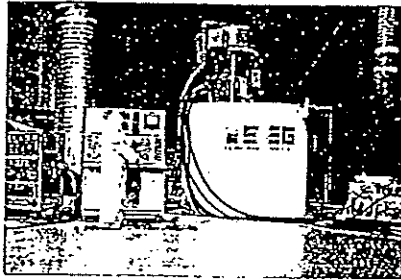
**Potentially clean wastes are processed through the "Green is Clean" program.**



**Vitrification** - The SEG Vitrifier is equipped with complete off-gas treatment system and process monitoring systems, and provides flexible operating characteristics for a wide range of waste feeds. The vitrified wastes are the highest performing, most environmentally stable waste form known, providing exceptional long term chemical and structural stability for storage or disposal. Vitrification achieves the highest volume reduction possible when combined with incineration.

**The best waste form possible.**

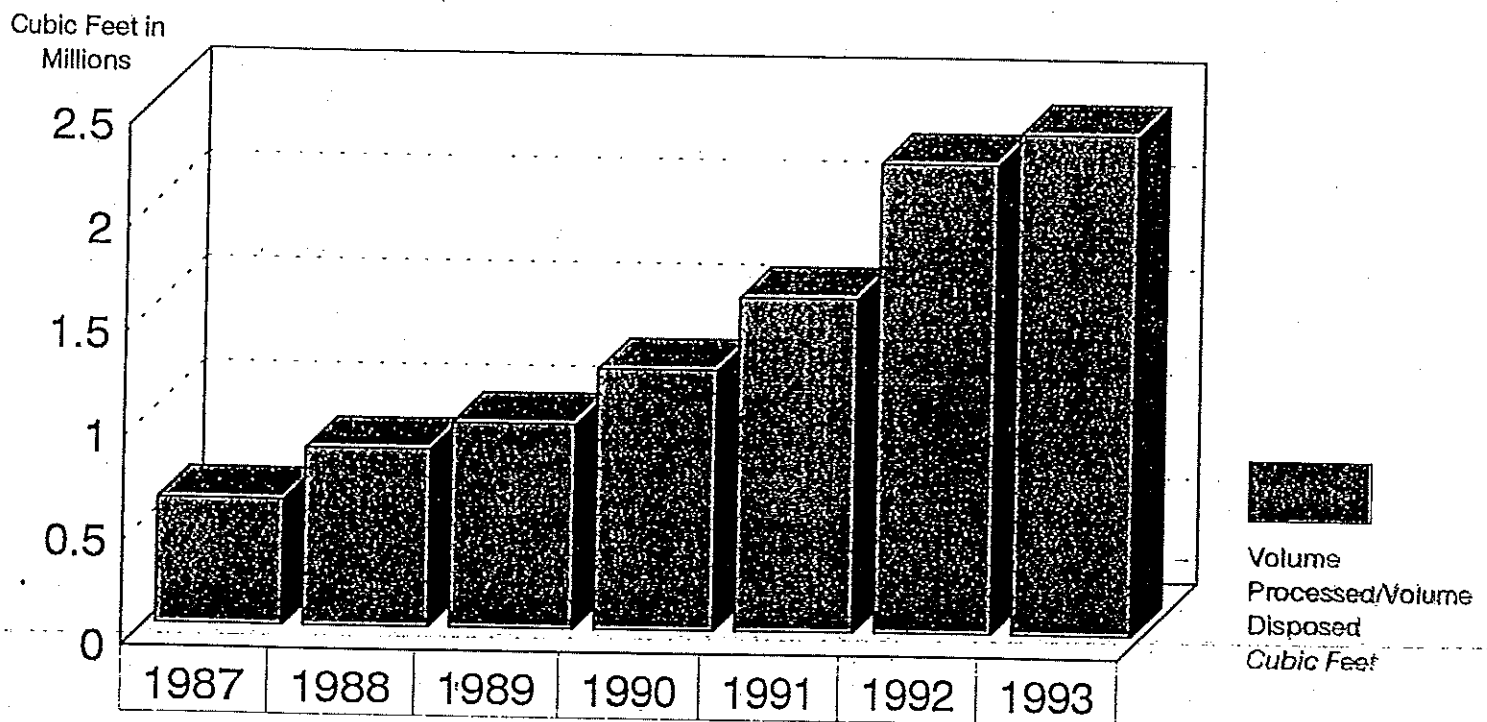
# PROVEN WASTE PROCESSING TECHNOLOGIES



Solidification - Waste not suitable for volume reduction is solidified in either steel liners or polyethylene HICs. Wastes requiring stabilization are solidified in high integrity containers while wastes not requiring stabilization are solidified in steel liners. SEG possesses NRC Topical Reports for waste solidification. These reports exemplify the quality on our solidification processes. Stabilization media includes cement, epoxy and glass vitrification. Our mobile solidification units write to process wastes at client facilities.

**SEG possesses  
NRC Topical  
Reports for  
waste  
solidification.**

## Volumes Processed and Volume Reduction





COPY



## Emergency Response Section - Initial Pollution Incident Report (IPIR)

5/8/2013

Spill Id Number: 9305-20-2077//0

District: NW

Reported By: CITIZEN

Title:

Telephone: (000) 000-0000 ext:

Affiliation: CITIZEN

Reported: 05/27/1993 17:07

Discovered: 05/27/1993 :

Occurred: 00/00/0000

Chronic: N

County: DEFIANCE

City/Township: DEFIANCE

Did Spiller Report ? N

Complaint ? Y

Received By: PRE1993 TO ENTER

Priority: 3

Local EPC ? N

Did you tell the Spiller to Call the N.R.C ? N

Business: N

SARA Report: N

Suspected Spiller: SK HAND TOOLS

Mailing Address: N/A

Telephone: (419) 784-1122 ext:

Location: 1648 SPRUCE ST

Source: FIXED FACILITY - INDUSTRY - STACK RELEASE-AIR

Cause: SLOPPY OPERATIONS

Reason: SLOPPY OPERATION

Waterways Affected: N/A

Media Affected 1: AIR

Media Affected 2:

Media Affected 3:

### Product(s) Spilled

Product	Amount	UOM	RQ	Size	Type	EHS
METAL FIBERS	.0	UNK	.0	U	A	N

### Other Agencies Notified

Agency	Person	Date	Time
DSW/WW		00/00/0000	

### Remark

METAL FIBERS FROM EXHAUST FAN ARE TAKING PAINT OFF CARS THICK PARTICLES RELEASED FROM STACKS ON LAND, ON CARS METAL PARTICLES COMPLETELY COVERS CARS ON GOING PROBLEM

**VAP PHASE I PROPERTY ASSESSMENT  
FORMER SK HAND TOOLS  
135 HICKORY STREET  
DEFIANCE, OHIO 43512  
KERAMIDA PROJECT NO. 15831**

**ATTACHMENT 6**  
KERAMIDA Personnel Qualifications



**Timothy Schnieber**  
**Staff Scientist**  
**Exp.: 1.5 years**

Mr. Schnieber is a 2012 graduate from Miami University in Oxford, Ohio with a B.A. degree in Environmental Earth Science and a minor in Physical Geography. He has over 1.5 years of professional experience in the environmental consulting industry and has been involved in geologic and hydrogeologic assessments of LUST sites as well as industrial and commercial sites. Mr. Schnieber has been performing field geological services as a Staff Scientist for KERAMIDA, including the oversight of soil borings and monitoring well installation, the collection of groundwater and soil samples, and the oversight of remediation processes including groundwater in-situ bioremediation injections. He has also managed data quality and prepared technical reports as well as performed ASTM and Ohio VAP Phase I and Phase II Environmental Site Assessments for various industrial and commercial sites.



**MICHAEL P. MAY, PE, CHMM, WSO-CHME.**  
**SENIOR PROJECT MANAGER**  
**Exp.: 29 years**

Mr. May holds a B.S. in Chemical Engineering from the University of Cincinnati and is a Registered Professional Engineer in the state of Ohio. He also is a Certified Hazardous Materials Manager (CHMM) by the Institute of Hazardous Materials Management, a Certified Hazardous Materials Executive by the World Safety Organization (WSO-CHME), and an authorized WMD Instructor by the Department of Homeland Security Office of Domestic Preparedness. Mr. May has 29 years of technical experience in the environmental management and engineering aspects of RCRA/CERCLA/NRC/PCS cleanup, hazardous waste management, remedial systems design, construction and installation management, permitting, start-up, monitoring, and management. He has over twenty years of experience with emergency response operations as well as over twenty five years of management experience with governmental and industrial environmental projects.

He has developed a streamlined approach to the budgeting, staffing, scheduling and management of core environmental projects. He functioned as the Corporate Health and Safety Manager, RSO and LAN administrator and assisted in the development and implementation of an electronic web-based Data Management System. He provided technical development, design, implementation, and management of remedial measures for RCRA, CERCLA, and BUSTR sites as well as engineering and safety program development for industrial clients.